

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION OPIATE LITIGATION

This document relates to:

Case No. 1:18-op-45749-DAP

THE BLACKFEET TRIBE OF THE BLACKFEET INDIAN
RESERVATION,

Plaintiff,

v.

AMERISOURCEBERGEN DRUG CORPORATION,
CARDINAL HEALTH, INC., McKESSON CORPORATION,
PURDUE PHARMA L.P., PURDUE PHARMA, INC., THE
PURDUE FREDERICK COMPANY, INC., TEVA
PHARMACEUTICAL INDUSTRIES, LTD., TEVA
PHARMACEUTICALS USA, INC., CEPHALON, INC.,
JOHNSON & JOHNSON, JANSSEN PHARMACEUTICALS,
INC. ORTHO-MCNEIL-JANSSEN PHARMACEUTICALS,
INC. n/k/a JANSSEN PHARMACEUTICALS, INC., JANSSEN
PHARMACEUTICA INC. n/k/a JANSSEN
PHARMACEUTICALS, INC., NORAMCO, INC., ENDO
HEALTH SOLUTIONS INC., ENDO PHARMACEUTICALS,
INC., PAR PHARMACEUTICAL, INC., PAR
PHARMACEUTICAL COMPANIES, INC., ALLERGAN PLC
f/k/a ACTAVIS PLC, ALLERGAN FINANCE LLC, f/k/a
ACTAVIS, INC., f/k/a WATSON PHARMACEUTICALS, INC.,
WATSON LABORATORIES, INC., ACTAVIS LLC, ACTAVIS
PHARMA, INC. f/k/a WATSON PHARMA, INC.,
MALLINCKRODT PLC, MALLINCKRODT LLC., SPECGX
LLC, INSYS THERAPEUTICS, INC., CVS PHARMACY, INC.,
CVS INDIANA, L.L.C., WALMART INC. f/k/a WAL-MART
STORES, INC., WALGREEN CO., WALGREEN ARIZONA
DRUG CO., ADVANTAGE LOGISTICS, ALBERTSON'S LLC,
ANDA PHARMACEUTICALS, INC., ASSOCIATED
PHARMACIES, INC., DAKOTA DRUG, INC., and SMITH'S
FOOD & DRUG CENTERS, INC. d/b/a PEYTON'S PHOENIX,

Defendant.

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**CORRECTED FIRST AMENDED
COMPLAINT**

DEMAND FOR JURY TRIAL

**ENDO HEALTH SOLUTIONS INC. AND ENDO PHARMACEUTICALS INC.’S
ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF’S
CORRECTED FIRST AMENDED COMPLAINT AND JURY DEMAND**

Defendants Endo Pharmaceuticals Inc. and Endo Health Solutions Inc. (collectively, “Endo”), by and through counsel, hereby answer Plaintiff’s Corrected First Amended Complaint (the “Complaint”). Except to the extent expressly admitted herein, Endo denies each and every allegation of the Complaint, including any allegations contained in its headings or footnotes. With respect to any purported document cited to or quoted from in the Complaint, by providing its answer here, Endo does not admit that the documents are accurate, relevant or admissible in this action, and Endo reserves all objections regarding admissibility. With respect to the specific paragraphs of the Complaint, Endo responds as follows:¹

ANSWER TO PARAGRAPH 1: Endo admits that Plaintiff purports to bring this action. Endo denies that any factual or legal basis exists for any of the claims against Endo in this action and denies that Plaintiff is entitled to any relief. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1 and denies them on that basis.

ANSWER TO PARAGRAPH 2: Endo admits that the misuse and abuse of opioids have created a public health crisis. Endo further admits that prescription opioid medications include both brand and generic and can help manage pain when used as intended in appropriate patients. Endo denies any insinuation that Endo is responsible for, or has caused, opioid misuse or abuse and further denies that the crisis involves solely the misuse or abuse of prescription

¹ Endo is an affiliate of Defendants Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc. (collectively, “Par”). To the extent Plaintiffs seek information about Par, Endo refers Plaintiff to Par’s Answer and Affirmative Defenses to Plaintiff’s Corrected First Amended Complaint and Jury Demand.

opioid medications. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 2 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 3: Endo denies the allegations in the second and third sentences of Paragraph 3 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 3 and denies them on that basis.

ANSWER TO PARAGRAPH 4: Paragraph 4 of the Complaint purports to characterize data which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 4 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 4 and denies them on that basis.

ANSWER TO PARAGRAPH 5: Endo admits that brand-name opioid medications include OxyContin, Opana ER, Vicodin, Subsys, and Duragesic (among others) and that generic opioid medications include oxycodone, hydrocodone, and fentanyl (among others). Paragraph 5 of the Complaint purports to characterize data which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 5 and denies them on that basis.

ANSWER TO PARAGRAPH 6: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 7: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 7 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 8: Paragraph 8 of the Complaint purports to characterize statements which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 8 and denies them on that basis.

ANSWER TO PARAGRAPH 9: Endo denies that it engaged in any "marketing scheme" or "supply chain scheme" and denies the remaining allegations in Paragraph 9 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 9 and denies them on that basis.

ANSWER TO PARAGRAPH 10: Endo denies the allegations in Paragraph 10 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 10 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 11: Endo denies the allegations in Paragraph 11 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 12: Endo denies the allegations in Paragraph 12 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 12 and denies them on that basis.

ANSWER TO PARAGRAPH 13: Endo denies the allegations in Paragraph 13 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 13 and denies them on that basis.

ANSWER TO PARAGRAPH 14: Endo denies the allegations in Paragraph 14 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 14 and denies them on that basis.

ANSWER TO PARAGRAPH 15: Endo denies the allegations in Paragraph 15 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 15 and denies them on that basis.

ANSWER TO PARAGRAPH 16: Endo admits that illegal pill mills and rogue prescribers have diverted legal medications for illegal purposes. Endo denies the allegations in Paragraph 16 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 16 and denies them on that basis.

ANSWER TO PARAGRAPH 17: Paragraph 17 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 17 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 17 and denies them on that basis.

ANSWER TO PARAGRAPH 18: Paragraph 18 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 18 to the extent they refer to Endo and its purported

conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 18 and denies them on that basis.

ANSWER TO PARAGRAPH 19: Endo denies the allegations in Paragraph 19 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 19 and denies them on that basis.

ANSWER TO PARAGRAPH 20: Endo denies the allegations in Paragraph 20 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 20 and denies them on that basis.

ANSWER TO PARAGRAPH 21: Endo denies the allegations in Paragraph 21 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 22: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 23: Endo denies that it is responsible for, or has caused, opioid misuse or abuse, denies that any factual or legal basis exists for any of the claims against Endo in this action, and denies that Plaintiff is entitled to any relief from Endo. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 23 and denies them on that basis.

JURISDICTION AND VENUE

ANSWER TO PARAGRAPH 24: The allegations in Paragraph 24 of the Complaint contain legal conclusions or arguments that require no answer. Further, Paragraph 24 purports to characterize federal statutes which speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 25: The allegations in Paragraph 25 of the Complaint contain legal conclusions or arguments that require no answer. Further, Paragraph 25 purports to characterize a federal statute which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 26: The allegations in Paragraph 26 of the Complaint contain legal conclusions or arguments that require no answer.

ANSWER TO PARAGRAPH 27: The allegations in Paragraph 27 of the Complaint contain legal conclusions or arguments that require no answer. Further, Paragraph 27 purports to characterize a federal statute and case law which speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 28: The allegations in Paragraph 28 of the Complaint contain legal conclusions or arguments that require no answer. Further, Paragraph 28 purports to characterize federal statutes which speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 29: The allegations in Paragraph 29 of the Complaint contain legal conclusions or arguments that require no answer.

PARTIES

I. PLAINTIFF

ANSWER TO PARAGRAPH 30: Endo denies that any factual or legal basis exists for any of the claims against Endo in this action or that Plaintiff is entitled to any relief from Endo. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 30 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 31: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 32: The allegations in Paragraph 32 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that Plaintiff has a viable public nuisance claim and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 32 and denies them on that basis.

ANSWER TO PARAGRAPH 33: The allegations in Paragraph 33 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that Plaintiff has a viable public nuisance claim and denies the allegations in Paragraph 33 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 33 and denies them on that basis.

ANSWER TO PARAGRAPH 34: The allegations in Paragraph 34 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 34 to the extent they refer to Endo and its purported conduct and denies any allegation that Plaintiff's alleged damages are attributable to

Endo. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 34 and denies them on that basis.

ANSWER TO PARAGRAPH 35: The allegations in Paragraph 35 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it engaged in any wrongful and/or unlawful conduct and denies that Plaintiff is entitled to any relief from Endo. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 35 and denies them on that basis.

ANSWER TO PARAGRAPH 36: The allegations in Paragraph 36 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 36 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36 to the extent they refer to other defendants and denies them on that basis.

II. DEFENDANTS

A. Marketing Defendants

ANSWER TO PARAGRAPH 37: Endo admits that it has marketed and sold certain prescription opioid medications, that at times it promoted certain opioid medications, and that it has provided information about the risks and benefits of its opioid medications, including through the FDA-approved labels. Endo denies any insinuation that it failed to warn of the risks associated with the use of its prescription opioid medications, denies that it failed to comply with applicable laws, and denies the remaining allegations in Paragraph 37 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 37 to the extent they refer to other defendants and denies them on that basis.

1. Purdue Entities

ANSWER TO PARAGRAPH 38: Paragraph 38 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38 and denies them on that basis.

ANSWER TO PARAGRAPH 39: Paragraph 39 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39 and denies them on that basis.

ANSWER TO PARAGRAPH 40: Paragraph 40 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 40 and denies them on that basis.

ANSWER TO PARAGRAPH 41: Paragraph 41 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 41 and denies them on that basis.

ANSWER TO PARAGRAPH 42: Paragraph 42 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42 and denies them on that basis.

ANSWER TO PARAGRAPH 43: Paragraph 43 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, the footnote in Paragraph 43 purports to characterize a federal statute which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43 and denies them on that basis.

ANSWER TO PARAGRAPH 44: Paragraph 44 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 44 and denies them on that basis.

2. Actavis Entities

ANSWER TO PARAGRAPH 45: Paragraph 45 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 45 and denies them on that basis.

ANSWER TO PARAGRAPH 46: Paragraph 46 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 46 and denies them on that basis.

3. Cephalon Entities

ANSWER TO PARAGRAPH 47: Paragraph 47 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 47 and denies them on that basis.

ANSWER TO PARAGRAPH 48: Paragraph 48 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48 and denies them on that basis.

ANSWER TO PARAGRAPH 49: Paragraph 49 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49 and denies them on that basis.

ANSWER TO PARAGRAPH 50: Paragraph 50 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50 and denies them on that basis.

4. Janssen Entities

ANSWER TO PARAGRAPH 51: Paragraph 51 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51 and denies them on that basis.

ANSWER TO PARAGRAPH 52: Paragraph 52 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52 and denies them on that basis.

ANSWER TO PARAGRAPH 53: Paragraph 53 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond,

Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53 and denies them on that basis.

ANSWER TO PARAGRAPH 54: Paragraph 54 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54 and denies them on that basis.

ANSWER TO PARAGRAPH 55: Paragraph 55 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 55 and denies them on that basis.

ANSWER TO PARAGRAPH 56: Paragraph 56 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56 and denies them on that basis.

ANSWER TO PARAGRAPH 57: Paragraph 57 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 57 and denies them on that basis.

ANSWER TO PARAGRAPH 58: Paragraph 58 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 58 and denies them on that basis.

ANSWER TO PARAGRAPH 59: Paragraph 59 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 59 and denies them on that basis.

ANSWER TO PARAGRAPH 60: Paragraph 60 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60 and denies them on that basis.

ANSWER TO PARAGRAPH 61: Paragraph 61 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61 and denies them on that basis.

5. Endo Entities

ANSWER TO PARAGRAPH 62: Endo admits that Endo Health Solutions Inc. was incorporated under the laws of the State of Delaware and is based in Malvern, Pennsylvania. Except as expressly admitted, Endo denies the allegations in Paragraph 62 of the Complaint.

ANSWER TO PARAGRAPH 63: Endo admits that Endo Pharmaceuticals Inc. was incorporated under the laws of the State of Delaware and is based in Malvern, Pennsylvania. Except as expressly admitted, Endo denies the allegations in Paragraph 63 of the Complaint.

ANSWER TO PARAGRAPH 64: Endo admits that Par Pharmaceutical, Inc. is a wholly-owned subsidiary of Par Pharmaceutical Companies, Inc.; that Par Pharmaceutical Companies, Inc. was incorporated under the laws of the State of Delaware; and that Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc. are based in Chestnut Ridge, New

York. Endo further admits that Endo International plc acquired Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc. in September 2015 and that Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc. are operating companies of Endo International plc. Except as expressly admitted, Endo denies the allegations in Paragraph 64 of the Complaint.

ANSWER TO PARAGRAPH 65: Endo admits that Endo Pharmaceuticals Inc. has at various times sold certain prescription opioid medications, including Opana ER, Opana, Percodan, and Percocet, and previously sold generic oxycodone, hydromorphone, and hydrocodone medications. Endo admits that Par Pharmaceutical, Inc. has at various times sold certain generic prescription opioid medications. Except as expressly admitted, Endo denies the allegations in Paragraph 65 the Complaint.

ANSWER TO PARAGRAPH 66: Endo denies the allegations in Paragraph 66 of the Complaint.

ANSWER TO PARAGRAPH 67: Endo admits that Endo Health Solutions Inc. reported \$3.03 billion in total revenues in 2012 and that from 2010 to 2013 it reported approximately \$1.15 billion of revenue from Opana ER. Endo admits that an affiliate of Endo has at various times sold generic prescription opioid medications. Except as expressly admitted, Endo denies the allegations in Paragraph 67 of the Complaint.

ANSWER TO PARAGRAPH 68: Endo admits that in June of 2017, the FDA requested that reformulated Opana ER be voluntarily removed from the market. Paragraph 68 purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

6. Insys Therapeutics, Inc.

ANSWER TO PARAGRAPH 69: Paragraph 69 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 69 and denies them on that basis.

ANSWER TO PARAGRAPH 70: Paragraph 70 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 70 and denies them on that basis.

ANSWER TO PARAGRAPH 71: Paragraph 71 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71 and denies them on that basis.

ANSWER TO PARAGRAPH 72: Paragraph 72 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72 and denies them on that basis.

ANSWER TO PARAGRAPH 73: Paragraph 73 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 73 and denies them on that basis.

7. Mallinckrodt Entities

ANSWER TO PARAGRAPH 74: Paragraph 74 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74 and denies them on that basis.

ANSWER TO PARAGRAPH 75: Paragraph 75 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75 and denies them on that basis.

ANSWER TO PARAGRAPH 76: Paragraph 76 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76 and denies them on that basis.

ANSWER TO PARAGRAPH 77: Paragraph 77 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 77 and denies them on that basis.

ANSWER TO PARAGRAPH 78: Paragraph 78 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 78 and denies them on that basis.

ANSWER TO PARAGRAPH 79: Paragraph 79 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond,

Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 79 and denies them on that basis.

ANSWER TO PARAGRAPH 80: Paragraph 80 of the Complaint does not require a response. To the extent an answer is required, Endo denies that any factual or legal basis exists for any of the claims against Endo in this action and denies that Plaintiff is entitled to any relief.

B. Distributor Defendants

ANSWER TO PARAGRAPH 81: Paragraph 81 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81 and denies them on that basis.

1. Cardinal Health, Inc.

ANSWER TO PARAGRAPH 82: Paragraph 82 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82 and denies them on that basis.

2. McKesson Corporation

ANSWER TO PARAGRAPH 83: Paragraph 83 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83 and denies them on that basis.

ANSWER TO PARAGRAPH 84: Paragraph 84 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond,

Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 84 and denies them on that basis.

3. AmerisourceBergen Drug Corporation

ANSWER TO PARAGRAPH 85: Paragraph 85 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 85 and denies them on that basis.

4. CVS Entities

ANSWER TO PARAGRAPH 86: Paragraph 86 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86 and denies them on that basis.

5. Walgreens Entities

ANSWER TO PARAGRAPH 87: Paragraph 87 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87 and denies them on that basis.

6. Walmart Inc.

ANSWER TO PARAGRAPH 88: Paragraph 88 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88 and denies them on that basis.

7. Advantage Logistics

ANSWER TO PARAGRAPH 89: Paragraph 89 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 89 and denies them on that basis.

8. Albertson's LLC

ANSWER TO PARAGRAPH 90: Paragraph 90 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 90 and denies them on that basis.

9. Anda Pharmaceuticals, Inc.

ANSWER TO PARAGRAPH 91: Paragraph 91 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 91 and denies them on that basis.

10. Associated Pharmacies, Inc.

ANSWER TO PARAGRAPH 92: Paragraph 92 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 92 and denies them on that basis.

11. Dakota Drug, Inc.

ANSWER TO PARAGRAPH 93: Paragraph 93 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond,

Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 93 and denies them on that basis.

12. Smith's Food & Drug Centers, Inc.

ANSWER TO PARAGRAPH 94: Paragraph 94 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94 and denies them on that basis.

ANSWER TO PARAGRAPH 95: Paragraph 95 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95 and denies them on that basis.

ANSWER TO PARAGRAPH 96: Paragraph 96 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. Further, the footnote in Paragraph 96 does not require a response. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96 and denies them on that basis.

ANSWER TO PARAGRAPH 97: Paragraph 97 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97 and denies them on that basis.

C. Agency and Authority

ANSWER TO PARAGRAPH 98: Endo denies the allegations in Paragraph 98 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 98 of the Complaint to the extent they refer to other defendants and denies them on that basis.

FACTUAL ALLEGATIONS

I. FACTS COMMON TO ALL CLAIMS

ANSWER TO PARAGRAPH 99: Endo admits that opioid medications are a class of medications that can bind to opioid receptors and include natural, synthetic and semi-synthetic opioids. Endo further admits that opioids may produce both analgesic and euphoric effects in users and that respiratory depression has been reported with the use of opioids. Except as expressly admitted, Endo denies the allegations in Paragraph 99 of the Complaint.

ANSWER TO PARAGRAPH 100: Endo admits that morphine, codeine, and thebaine are opioids. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 100 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 101: Paragraph 101 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 101 and denies them on that basis.

ANSWER TO PARAGRAPH 102: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 103: Endo admits that heroin and opium are classified as illicit drugs. Except as expressly admitted, Endo denies the allegations in Paragraph 103 of the Complaint.

ANSWER TO PARAGRAPH 104: Endo admits that opioids expose users to the risks of addiction, abuse, and misuse and that certain opioid medications have been regulated as controlled substances. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 104 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 105: Endo admits that Endo Pharmaceuticals Inc. has at various times marketed and sold the prescription opioid medications Percodan (oxycodone hydrochloride and aspirin) and Percocet (oxycodone hydrochloride and acetaminophen). Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 105 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 106: Paragraph 106 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106 and denies them on that basis.

ANSWER TO PARAGRAPH 107: Paragraph 107 of the Complaint purports to characterize a statement and study which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 107 and denies them on that basis.

ANSWER TO PARAGRAPH 108: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 109: Endo denies the allegations in Paragraph 109 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 109 and denies them on that basis.

ANSWER TO PARAGRAPH 110: Endo denies the allegations in Paragraph 110 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 110 and denies them on that basis.

ANSWER TO PARAGRAPH 111: Endo admits that Opana ER was generally intended for administration at a frequency of every 12 hours. Endo admits that opioid medications are also available in short-acting formulations. Except as expressly admitted, Endo denies the allegations in Paragraph 111 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 111 and denies them on that basis.

ANSWER TO PARAGRAPH 112: Endo acknowledges that some patients can develop a tolerance to and physical dependence on opioids and that respiratory depression has been reported with the use of opioids. Except as expressly admitted, Endo denies the allegations in Paragraph 112 of the Complaint.

ANSWER TO PARAGRAPH 113: Endo acknowledges that some patients can experience withdrawal symptoms after abrupt discontinuation or a significant dosage reduction of opioids. Except as expressly admitted, Endo denies the allegations in Paragraph 113 of the Complaint.

ANSWER TO PARAGRAPH 114: Endo denies the allegation in Paragraph 114 of the Complaint.

ANSWER TO PARAGRAPH 115: Endo denies the allegations in Paragraph 115 of the Complaint and the headings preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 115 and the headings preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 116: Paragraph 116 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116 and denies them on that basis.

ANSWER TO PARAGRAPH 117: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 118: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 119: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 120: Endo admits that it has at times taken into account prescribers' specialties and prescription data to inform its detailing decisions. Except as expressly admitted, Endo denies the allegations in Paragraph 120 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to

form a belief as to the truth of the remaining allegations in Paragraph 120 and denies them on that basis.

ANSWER TO PARAGRAPH 121: Paragraph 121 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 122: Paragraph 122 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 122 and denies them on that basis.

ANSWER TO PARAGRAPH 123: Paragraph 123 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123 and denies them on that basis.

ANSWER TO PARAGRAPH 124: Paragraph 124 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124 and denies them on that basis.

ANSWER TO PARAGRAPH 125: Paragraph 125 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125 and denies them on that basis.

ANSWER TO PARAGRAPH 126: Paragraph 126 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126 and denies them on that basis.

ANSWER TO PARAGRAPH 127: Paragraph 127 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127 and denies them on that basis.

ANSWER TO PARAGRAPH 128: Paragraph 128 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128 and denies them on that basis.

ANSWER TO PARAGRAPH 129: Paragraph 129 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 129 and denies them on that basis.

ANSWER TO PARAGRAPH 130: Paragraph 130 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 130 and denies them on that basis.

ANSWER TO PARAGRAPH 131: Paragraph 131 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131 and denies them on that basis.

ANSWER TO PARAGRAPH 132: Paragraph 132 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 132 and denies them on that basis.

ANSWER TO PARAGRAPH 133: Endo denies the allegations in Paragraph 133 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 133 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 134: Endo admits that Endo Pharmaceuticals Inc. has sold certain opioid medications at various times, including Opana ER (oxymorphone hydrochloride extended-release), Opana (oxymorphone hydrochloride immediate release), Percocet, Percodan, and generic oxycodone. Except as expressly admitted, Endo denies the allegations in Paragraph 134 of the Complaint to the extent they refer to Endo and its purported conduct. Moreover, Paragraph 134 purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 134 and denies them on that basis.

ANSWER TO PARAGRAPH 135: Endo denies the allegations in Paragraph 135 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 135 and denies them on that basis.

ANSWER TO PARAGRAPH 136: Endo admits that Endo Pharmaceuticals Inc. previously marketed Opana ER and Opana beginning in 2006, and that Endo submitted additional clinical trials supporting the new drug applications (“NDAs”) for Opana ER and Opana subsequent to Endo’s initial filing of those NDAs. Paragraph 136 of the Complaint purports to characterize those studies which speak for themselves, and Endo denies Plaintiff’s characterization of them. Endo denies the remaining allegations in Paragraph 136.

ANSWER TO PARAGRAPH 137: Endo admits that on June 8, 2017, the FDA requested that reformulated Opana ER be removed from the market. Endo further admits that, on July 6, 2017, Endo announced that it would voluntarily remove Opana ER from the market. Paragraph 137 of the Complaint purports to characterize a press release which speaks for itself, and Endo denies Plaintiff’s characterization of it. Except as expressly admitted, Endo denies the remaining allegations in Paragraph 137 of the Complaint to the extent they refer to Endo and its purported conduct.

ANSWER TO PARAGRAPH 138: Paragraph 138 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138 and denies them on that basis.

ANSWER TO PARAGRAPH 139: Paragraph 139 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 139 and denies them on that basis.

ANSWER TO PARAGRAPH 140: Endo admits that from 2010 to 2013 Endo Health Solutions Inc. reported approximately \$1.15 billion of revenue from Opana ER. Except as expressly admitted, Endo denies the remaining allegations in Paragraph 140 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 140 to the extent they refer to other defendants and denies them on that basis

ANSWER TO PARAGRAPH 141: The allegations in Paragraph 141 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 141 and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge of information sufficient to form a belief as to the truth of the allegations in Paragraph 141 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 142: The allegations in Paragraph 142 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that its actions “created, perpetuated or maintained” opioid misuse or abuse and denies the remaining allegations in Paragraph 142 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 142 and denies them on that basis.

ANSWER TO PARAGRAPH 143: The allegations in Paragraph 143 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that a pharmaceutical company should provide accurate labeling, marketing and promotional materials for the FDA-approved medications that it sells. Endo further admits that controlled substances should be distributed and dispensed in accordance with

applicable federal and state laws. Endo denies Plaintiff's characterization of what the law requires and denies the remaining allegations in Paragraph 143 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 143 and denies them on that basis.

ANSWER TO PARAGRAPH 144: Endo denies the allegations in Paragraph 144 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 145: Endo denies the allegations in Paragraph 145 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 145 and denies them on that basis.

ANSWER TO PARAGRAPH 146: Endo denies the allegations in Paragraph 146 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 146 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 147: Endo denies that it made any misrepresentations and denies the remaining allegations in Paragraph 147 of the Complaint, the heading preceding it, and all subparts thereto to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 147, the heading preceding it, and all subparts thereto to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 148: Endo denies the allegations in Paragraph 148 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 148 and denies them on that basis.

ANSWER TO PARAGRAPH 149: Endo denies that it made any misrepresentations and denies the remaining allegations in Paragraph 149 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 149 and denies them on that basis.

ANSWER TO PARAGRAPH 150: Endo denies the allegations in Paragraph 150 of the Complaint and the heading preceding it, as stated, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 150 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 151: Endo denies the allegations in Paragraph 151 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 152: Paragraph 152 of the Complaint purports to characterize various writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 152.

ANSWER TO PARAGRAPH 153: Endo denies the allegations in Paragraph 153 of the Complaint to the extent they refer to Endo and its purported conduct. The remaining allegations in Paragraph 153, and the heading preceding it, concern a defendant other than Endo, so Endo is

not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153 and the heading preceding it concerning another defendant and denies them on that basis.

ANSWER TO PARAGRAPH 154: Paragraph 154 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 155: Paragraph 155 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 156: Paragraph 156 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 156 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 156 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 157: Paragraph 157 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 157 and denies them on that basis.

ANSWER TO PARAGRAPH 158: Paragraph 158 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 158 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 159: Paragraph 159 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 160: Paragraph 160 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160 and denies them on that basis.

ANSWER TO PARAGRAPH 161: Paragraph 161 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161 and denies them on that basis.

ANSWER TO PARAGRAPH 162: Paragraph 162 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162 and denies them on that basis.

ANSWER TO PARAGRAPH 163: Paragraph 163 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163 and denies them on that basis.

ANSWER TO PARAGRAPH 164: Paragraph 164 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 164 and denies them on that basis.

ANSWER TO PARAGRAPH 165: Paragraph 165 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165 and denies them on that basis.

ANSWER TO PARAGRAPH 166: Paragraph 166 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 166 and denies them on that basis.

ANSWER TO PARAGRAPH 167: Paragraph 167 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 167 and denies them on that basis.

ANSWER TO PARAGRAPH 168: Paragraph 168 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168 and denies them on that basis.

ANSWER TO PARAGRAPH 169: Paragraph 169 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169 and denies them on that basis.

ANSWER TO PARAGRAPH 170: Paragraph 170 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 170 and denies them on that basis.

ANSWER TO PARAGRAPH 171: Paragraph 171 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 171 and denies them on that basis.

ANSWER TO PARAGRAPH 172: Paragraph 172 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172 and denies them on that basis.

ANSWER TO PARAGRAPH 173: Endo denies the allegations in Paragraph 203 of the Complaint and the heading preceding it.

ANSWER TO PARAGRAPH 174: Paragraph 174 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 175: Paragraph 175 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 175.

ANSWER TO PARAGRAPH 176: Endo admits that it has at times provided educational grant funding to APF and NIPC. Paragraph 176 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 176 and the footnote to Paragraph 176.

ANSWER TO PARAGRAPH 177: Paragraph 177 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 177.

ANSWER TO PARAGRAPH 178: Endo admits that it has at times provided independent educational grant funding to NIPC and that it made available at various times a pamphlet entitled *Understanding Your Pain: Taking Oral Opioid Analgesics*. Paragraph 178 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 178.

ANSWER TO PARAGRAPH 179: Endo admits that it made available a pamphlet titled *Living with Someone With Chronic Pain*. Paragraph 179 of the Complaint purports to characterize the pamphlet and a website which speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 180: Paragraph 180 of the Complaint purports to characterize a publication which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 180.

ANSWER TO PARAGRAPH 181: Paragraph 181 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 181 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 182: Paragraph 182 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 182 and denies them on that basis.

ANSWER TO PARAGRAPH 183: Paragraph 183 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183 and denies them on that basis.

ANSWER TO PARAGRAPH 184: Paragraph 184 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184 and denies them on that basis.

ANSWER TO PARAGRAPH 185: Paragraph 185 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185 and denies them on that basis.

ANSWER TO PARAGRAPH 186: Paragraph 186 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186 and denies them on that basis.

ANSWER TO PARAGRAPH 187: Paragraph 187 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187 and denies them on that basis.

ANSWER TO PARAGRAPH 188: Paragraph 188 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 188 and denies them on that basis.

ANSWER TO PARAGRAPH 189: Paragraph 189 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 189 and denies them on that basis.

ANSWER TO PARAGRAPH 190: Paragraph 190 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 190 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 191: Paragraph 191 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 191 and denies them on that basis.

ANSWER TO PARAGRAPH 192: Paragraph 192 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192 and denies them on that basis.

ANSWER TO PARAGRAPH 193: Paragraph 193 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the

extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 194: Paragraph 194 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 194 and denies them on that basis.

ANSWER TO PARAGRAPH 195: Paragraph 195 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 195 and denies them on that basis.

ANSWER TO PARAGRAPH 196: Paragraph 196 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 196 and denies them on that basis.

ANSWER TO PARAGRAPH 197: Paragraph 197 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 197 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 198: Paragraph 198 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 198 and denies them on that basis.

ANSWER TO PARAGRAPH 199: Paragraph 199 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 199 and denies them on that basis.

ANSWER TO PARAGRAPH 200: Paragraph 200 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 200 and denies them on that basis.

ANSWER TO PARAGRAPH 201: Endo denies the allegations in Paragraph 201 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 201 and denies them on that basis.

ANSWER TO PARAGRAPH 202: Endo denies the allegations in Paragraph 202 of the Complaint and the heading preceding it, as stated, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 202 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 203: Paragraph 203 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203 and denies them on that basis.

ANSWER TO PARAGRAPH 204: Paragraph 204 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 204 and denies them on that basis.

ANSWER TO PARAGRAPH 205: Paragraph 205 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 205 and denies them on that basis.

ANSWER TO PARAGRAPH 206: Paragraph 206 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 206 and denies them on that basis.

ANSWER TO PARAGRAPH 207: Paragraph 207 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 207 and denies them on that basis.

ANSWER TO PARAGRAPH 208: Endo admits that it provided an independent educational grant to support a 2007 supplement *Pain Management Dilemmas in Primary Care* that appeared in the *Journal of Family Practice*. Endo admits that one author of the supplement later participated in Endo speakers' programs. Paragraph 208 of the Complaint purports to characterize the supplement which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 208.

ANSWER TO PARAGRAPH 209: Endo denies the allegations in Paragraph 209 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 209 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 210: Paragraph 210 of the Complaint purports to characterize a study which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 210 and the heading preceding it, as stated, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 210 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 211: Endo denies the allegations in Paragraph 211 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 211 these to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 212: Endo admits that it provided independent educational grant funding to the Federation of State Medical Boards in connection with *Responsible Opioid Prescribing*. Paragraph 212 of the Complaint purports to characterize a publication which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 213: Paragraph 213 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 213 and denies them on that basis.

ANSWER TO PARAGRAPH 214: Paragraph 214 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 244 and denies them on that basis.

ANSWER TO PARAGRAPH 215: Paragraph 215 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 215.

ANSWER TO PARAGRAPH 216: Endo admits that it at times provided independent educational grant funding to NIPC. Paragraph 216 of the Complaint purports to characterize CME materials which speak for themselves, and Endo denies Plaintiff's characterization of them. Except as expressly admitted, Endo denies the allegations in Paragraph 216.

ANSWER TO PARAGRAPH 217: Endo admits that in March 2016, it executed an Assurance of Discontinuation ("AOD") with the New York Attorney General. Paragraph 217 of the Complaint purports to characterize the AOD which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 217.

ANSWER TO PARAGRAPH 218: Paragraph 218 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 218 and denies them on that basis.

ANSWER TO PARAGRAPH 219: Paragraph 219 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 219 and denies them on that basis.

ANSWER TO PARAGRAPH 220: Paragraph 220 of the Complaint purports to characterize a guideline which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 221: Endo denies the allegations in Paragraph 221 of the Complaint and the heading preceding it, as stated, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 221 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 222: Endo admits that it has at times provided funding for CMEs. Endo further admits that some patients can experience withdrawal symptoms after an abrupt discontinuation of opioids and that signs and symptoms of withdrawal may include, but are not limited to, anxiety. Paragraph 222 of the Complaint purports to characterize a CME which speaks for itself, and Endo denies Plaintiff's characterization of it. Except as expressly admitted, Endo denies the allegations in Paragraph 222.

ANSWER TO PARAGRAPH 223: Paragraph 223 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 223 and denies them on that basis.

ANSWER TO PARAGRAPH 224: Endo denies that it made misrepresentations and denies the remaining allegations in Paragraph 224 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief

as to the truth of the allegations in Paragraph 224 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 225: Endo denies the allegations in Paragraph 225 of the Complaint and the heading preceding it, as stated, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 225 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 226: Endo admits that some patients can develop a tolerance to opioids. Except as expressly admitted, Endo denies the allegations in Paragraph 226 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 226 and denies them on that basis.

ANSWER TO PARAGRAPH 227: Paragraph 227 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 227 and denies them on that basis.

ANSWER TO PARAGRAPH 228: Endo denies the allegations in the first sentence of Paragraph 228 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 228 and denies them on that basis.

ANSWER TO PARAGRAPH 229: Endo denies that it made misrepresentations and denies the allegations in Paragraph 229 of the Complaint to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 229 and denies them on that basis.

ANSWER TO PARAGRAPH 230: Paragraph 230 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230 and denies them on that basis.

ANSWER TO PARAGRAPH 231: Paragraph 231 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 231.

ANSWER TO PARAGRAPH 232: Endo admits that it made available a pamphlet entitled *Understanding Your Pain: Taking Oral Opioid Analgesics*. Paragraph 232 of the Complaint purports to characterize the pamphlet which speaks for itself, and Endo denies Plaintiff's characterization of it. Except as expressly admitted, Endo denies the allegations in Paragraph 232.

ANSWER TO PARAGRAPH 233: Paragraph 233 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 233 and denies them on that basis.

ANSWER TO PARAGRAPH 234: Paragraph 234 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 234 and denies them on that basis.

ANSWER TO PARAGRAPH 235: Paragraph 235 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 235 and denies them on that basis.

ANSWER TO PARAGRAPH 236: Paragraph 236 of the Complaint purports to characterize a statement and a study which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo further denies the allegations in Paragraph 236 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 236 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 237: Endo denies the allegations in Paragraph 237 of the Complaint and the heading preceding it, as stated, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 237 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 238: Paragraph 238 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238 and denies them on that basis.

ANSWER TO PARAGRAPH 239: Paragraph 239 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 239 and denies them on that basis.

ANSWER TO PARAGRAPH 240: Paragraph 240 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 240 and denies them on that basis.

ANSWER TO PARAGRAPH 241: Paragraph 241 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 241 and denies them on that basis.

ANSWER TO PARAGRAPH 242: Paragraph 242 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 242 and denies them on that basis.

ANSWER TO PARAGRAPH 243: Paragraph 243 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 248.

ANSWER TO PARAGRAPH 244: Endo admits that it provided some independent educational grant funding relating to *Responsible Opioid Prescribing*. Endo admits that it purchased copies of the book *Responsible Opioid Prescribing* and that it made copies of the book available to appropriate physicians. Paragraph 244 of the Complaint purports to characterize the publication which speaks for itself, and Endo denies Plaintiff's characterization of it. Except as expressly admitted, Endo denies the allegations in Paragraph 244 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to

form a belief as to the truth of the allegations in Paragraph 244 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 245: Paragraph 245 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 245 and denies them on that basis.

ANSWER TO PARAGRAPH 246: Paragraph 246 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 246 and denies them on that basis.

ANSWER TO PARAGRAPH 247: Endo admits that it has at times provided independent educational grant funding to NIPC. Paragraph 247 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 247.

ANSWER TO PARAGRAPH 248: Endo admits that it has at times provided independent educational grant funding to NIPC. Paragraph 248 of the Complaint purports to characterize a CME which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 248.

ANSWER TO PARAGRAPH 249: Paragraph 249 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 249 and denies them on that basis.

ANSWER TO PARAGRAPH 250: Paragraph 250 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 250 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 250 and denies them on that basis.

ANSWER TO PARAGRAPH 251: Paragraph 251 of the Complaint purports to characterize studies which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 251.

ANSWER TO PARAGRAPH 252: Paragraph 252 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 252 and denies them on that basis.

ANSWER TO PARAGRAPH 253: Paragraph 253 of the Complaint purports to characterize various writings which speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 254: Endo denies the allegations in Paragraph 254 of the Complaint and the heading preceding it, as stated, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 254 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 255: Paragraph 255 of the Complaint purports to characterize various writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 255 to the extent they refer to

Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 255 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 256: Paragraph 256 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 256 and denies them on that basis.

ANSWER TO PARAGRAPH 257: Paragraph 257 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 257 and denies them on that basis.

ANSWER TO PARAGRAPH 258: Endo admits that it has at times provided independent educational grant funding to NIPC. Paragraph 258 of the Complaint purports to characterize a website and publication which speak for themselves, and Endo denies Plaintiff's characterization of them. Except as expressly admitted, Endo denies the remaining allegations in Paragraph 258.

ANSWER TO PARAGRAPH 259: Endo admits that it at times provided independent educational grant funding to NIPC. Paragraph 259 of the Complaint purports to characterize a CME which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 259.

ANSWER TO PARAGRAPH 260: Endo admits that it made the article *Case Challenges in Pain Management: Opioid Therapy for Chronic Pain* available. Paragraph 260 of

the Complaint purports to characterize the article, which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 260.

ANSWER TO PARAGRAPH 261: Paragraph 261 of the Complaint purports to characterize an article which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 261.

ANSWER TO PARAGRAPH 262: Endo admits that it has at times provided funding for CMEs. Paragraph 262 of the Complaint purports to characterize a CME which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 262 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 262 and denies them on that basis.

ANSWER TO PARAGRAPH 263: Paragraph 263 purports to characterize a study which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 263 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 263 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 264: Paragraph 264 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 264 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 265: Paragraph 265 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 265 and denies them on that basis.

ANSWER TO PARAGRAPH 266: Paragraph 266 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 266 and denies them on that basis.

ANSWER TO PARAGRAPH 267: Paragraph 267 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 267 and denies them on that basis.

ANSWER TO PARAGRAPH 268: Paragraph 268 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 268 and denies them on that basis.

ANSWER TO PARAGRAPH 269: Paragraph 269 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 269 and denies them on that basis.

ANSWER TO PARAGRAPH 270: Paragraph 270 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 270 and denies them on that basis.

ANSWER TO PARAGRAPH 271: Paragraph 271 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 271 and denies them on that basis.

ANSWER TO PARAGRAPH 272: Paragraph 272 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 272 and denies them on that basis.

ANSWER TO PARAGRAPH 273: Endo denies the allegations in Paragraph 273 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 273 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 274: Paragraph 274 of the Complaint purports to characterize statements which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 274.

ANSWER TO PARAGRAPH 275: Paragraph 275 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 275 and denies them on that basis.

ANSWER TO PARAGRAPH 276: Endo admits that in 2012, Endo Pharmaceuticals Inc. introduced a version of Opana ER that was reformulated to make the pill harder to

manipulate. Except as expressly admitted, Endo denies the allegations in Paragraph 276 of the Complaint and the heading preceding it, as stated, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 276 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 277: Paragraph 277 of the Complaint purports to characterize statements which speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 278: Paragraph 278 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 278 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 279: Paragraph 279 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 279 and denies them on that basis.

ANSWER TO PARAGRAPH 280: Paragraph 280 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 280 and denies them on that basis.

ANSWER TO PARAGRAPH 281: Paragraph 281 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 281 and denies them on that basis.

ANSWER TO PARAGRAPH 282: Paragraph 282 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 282 and denies them on that basis.

ANSWER TO PARAGRAPH 283: Paragraph 283 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 283 and denies them on that basis.

ANSWER TO PARAGRAPH 284: Paragraph 284 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 284 and denies them on that basis.

ANSWER TO PARAGRAPH 285: Paragraph 285 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 285 and denies them on that basis.

ANSWER TO PARAGRAPH 286: Paragraph 286 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 286 and denies them on that basis.

ANSWER TO PARAGRAPH 287: Paragraph 287 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 287 and denies them on that basis.

ANSWER TO PARAGRAPH 288: Paragraph 288 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 288 and denies them on that basis.

ANSWER TO PARAGRAPH 289: Paragraph 289 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 289 and denies them on that basis.

ANSWER TO PARAGRAPH 290: Endo denies the allegations in Paragraph 290 of the Complaint and the heading preceding it.

ANSWER TO PARAGRAPH 291: Endo admits that oxymorphone has a lower oral bioavailability than certain other opioid molecules and that the bioavailability of oxymorphone varies based on the route of administration (like many medications, in general). Except as expressly admitted, Endo denies the allegations in Paragraph 291 of the Complaint.

ANSWER TO PARAGRAPH 292: Paragraph 292 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 292.

ANSWER TO PARAGRAPH 293: Endo admits that a reformulated version of Opana ER was approved by the FDA in December 2011. Except as expressly admitted, Endo denies the allegations in Paragraph 293 of the Complaint.

ANSWER TO PARAGRAPH 294: Paragraph 294 of the Complaint purports to characterize statements and correspondence which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 294.

ANSWER TO PARAGRAPH 295: Paragraph 295 of the Complaint purports to characterize a letter which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 295.

ANSWER TO PARAGRAPH 296: Paragraph 296 of the Complaint purports to characterize a letter which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 296.

ANSWER TO PARAGRAPH 297: Paragraph 297 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 297.

ANSWER TO PARAGRAPH 298: Endo admits that it submitted a citizen petition to FDA on August 10, 2012 regarding Opana ER; that it submitted a second citizen petition to FDA on August 31, 2012 regarding Opana ER; and that it submitted to FDA supplements to its August 10, 2012 citizen petition. Paragraph 298 of the Complaint purports to characterize various writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 298.

ANSWER TO PARAGRAPH 299: Paragraph 299 of the Complaint purports to characterize court filings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations to Paragraph 299.

ANSWER TO PARAGRAPH 300: Paragraph 300 of the Complaint purports to characterize a statement which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 300.

ANSWER TO PARAGRAPH 301: Paragraph 301 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 302: Paragraph 302 of the Complaint purports to characterize statements which speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 303: Paragraph 303 of the Complaint purports to characterize a memorandum and data which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 303.

ANSWER TO PARAGRAPH 304: Paragraph 304 of the Complaint purports to characterize data which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 304 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 304 and denies them on that basis.

ANSWER TO PARAGRAPH 305: Endo denies the allegations in Paragraph 305 of the Complaint.

ANSWER TO PARAGRAPH 306: Endo denies the allegations in Paragraph 306 of the Complaint.

ANSWER TO PARAGRAPH 307: Paragraph 307 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 307 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 307 and denies them on that basis.

ANSWER TO PARAGRAPH 308: Paragraph 308 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 308.

ANSWER TO PARAGRAPH 309: Paragraph 309 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 309.

ANSWER TO PARAGRAPH 310: Paragraph 310 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 310.

ANSWER TO PARAGRAPH 311: Paragraph 311 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 311 of the Complaint.

ANSWER TO PARAGRAPH 312: Endo admits that on June 8, 2017, the FDA requested that it remove Opana ER from the market and that on July 6, 2017, Endo announced that it decided to voluntarily remove Opana ER from the market. Endo denies the remaining allegations in Paragraph 312 of the Complaint.

ANSWER TO PARAGRAPH 313: Paragraph 313 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the

extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 313 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 314: Paragraph 314 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 314 and denies them on that basis.

ANSWER TO PARAGRAPH 315: Paragraph 315 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 315 and denies them on that basis.

ANSWER TO PARAGRAPH 316: Endo denies the allegations in Paragraph 316 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 316 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 317: Endo denies the allegations in Paragraph 317 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 317 and denies them on that basis.

ANSWER TO PARAGRAPH 318: Endo denies the allegations in Paragraph 318 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 318 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 319: Endo denies the allegations in Paragraph 319 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 319 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 320: Paragraph 320 of the Complaint purports to characterize a report which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 320 and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 320 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 321: Paragraph 321 of the Complaint purports to characterize a report which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 321 and denies them on that basis.

ANSWER TO PARAGRAPH 322: Paragraph 322 of the Complaint purports to characterize a report which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 322 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 322 and denies them on that basis.

ANSWER TO PARAGRAPH 323: Paragraph 323 of the Complaint purports to characterize a report which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 323.

ANSWER TO PARAGRAPH 324: Endo denies the allegations in Paragraph 324 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 324 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 325: Endo admits that it provided funding to APF prior to 2012. Except as expressly admitted, Endo denies the allegations in Paragraph 325 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 325 and denies them on that basis.

ANSWER TO PARAGRAPH 326: Paragraph 326 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 326 and denies them on that basis.

ANSWER TO PARAGRAPH 327: Endo admits that it provided independent educational grant funding to NIPC. Paragraph 327 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it. Except as expressly admitted, Endo denies the allegations in Paragraph 327 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 327 and denies them on that basis.

ANSWER TO PARAGRAPH 328: Endo denies the allegations in Paragraph 328 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 328 and denies them on that basis.

ANSWER TO PARAGRAPH 329: Endo denies the allegations in Paragraph 329 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 329 and denies them on that basis.

ANSWER TO PARAGRAPH 330: Paragraph 330 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 330 and denies them on that basis.

ANSWER TO PARAGRAPH 331: Paragraph 331 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 331 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 331 and denies them on that basis.

ANSWER TO PARAGRAPH 332: Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 332 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 333: Endo admits that it has provided independent educational grant funding to the AAPM and the APS at certain times. Except as expressly admitted, Endo denies the allegations in Paragraph 333 of the Complaint to the extent they refer

to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 333 and denies them on that basis.

ANSWER TO PARAGRAPH 334: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 334 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 335: Endo admits that it has at times provided independent educational grant funding to Scott Fishman. Except as expressly admitted, Endo denies the allegations in Paragraph 335 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 335 and denies them on that basis.

ANSWER TO PARAGRAPH 336: Endo admits that it has provided independent educational grant funding to the AAPM at certain times and that it was a corporate member of AAPM. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 336 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 337: Endo admits that at times it was a corporate member of AAPM. Except as expressly admitted, Endo denies the allegations in Paragraph 337 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 337 and denies them on that basis.

ANSWER TO PARAGRAPH 338: Endo denies the allegations in Paragraph 338 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 338 and denies them on that basis.

ANSWER TO PARAGRAPH 339: Endo admits that it has at times provided funding to Perry Fine. Except as expressly admitted, Endo denies the allegations in Paragraph 339 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 339 and denies them on that basis.

ANSWER TO PARAGRAPH 340: Endo denies the allegations in Paragraph 340 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 340 and denies them on that basis.

ANSWER TO PARAGRAPH 341: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 341 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 342: Paragraph 342 of the Complaint purports to characterize guidelines which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 342 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 342 and denies them on that basis.

ANSWER TO PARAGRAPH 343: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 343 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 344: Endo admits that it at times held speakers' programs relating to Opana ER. Paragraph 344 of the Complaint purports to characterize a presentation which speaks for itself, and Endo denies Plaintiff's characterization of it. Except as

expressly admitted, Endo denies the allegations in Paragraph 344 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 344 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 345: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 345 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 346: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 346 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 347: Paragraph 347 of the Complaint purports to characterize guidelines which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 347 and denies them on that basis.

ANSWER TO PARAGRAPH 348: Paragraph 348 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 348 and denies them on that basis.

ANSWER TO PARAGRAPH 349: Paragraph 349 of the Complaint purports to characterize a publication and website which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 349 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 349 and denies them on that basis.

ANSWER TO PARAGRAPH 350: Endo denies the allegations in Paragraph 350 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 350 and denies them on that basis.

ANSWER TO PARAGRAPH 351: Endo admits that it has at times provided independent educational grant funding to the Alliance for Patient Access. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 351 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 352: Endo denies the allegations in Paragraph 352 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 352 and denies them on that basis.

ANSWER TO PARAGRAPH 353: Paragraph 353 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 354: Paragraph 354 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 355: Paragraph 355 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 355 and denies them on that basis.

ANSWER TO PARAGRAPH 356: Paragraph 356 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 357: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 357 and denies them on that basis.

ANSWER TO PARAGRAPH 358: Paragraph 358 of the Complaint purports to characterize various writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 358 and denies them on that basis.

ANSWER TO PARAGRAPH 359: Endo admits that it has at times provided funding to the U.S. Pain Foundation. Paragraph 359 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it. Except as expressly admitted, Endo denies the allegations in Paragraph 359 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 359 and denies them on that basis.

ANSWER TO PARAGRAPH 360: Endo admits that it has at times provided independent educational grant funding to AGS in connection with a CME relating to AGS's 2009 Guidelines. Except as expressly admitted, Endo denies the allegations in Paragraph 360 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 360 and denies them on that basis.

ANSWER TO PARAGRAPH 361: Paragraph 361 of the Complaint purports to characterize guidelines which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 361 and denies them on that basis.

ANSWER TO PARAGRAPH 362: Endo denies the allegations in Paragraph 362 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 362 and denies them on that basis.

ANSWER TO PARAGRAPH 363: Endo denies the allegations in Paragraph 363 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 363 and denies them on that basis.

ANSWER TO PARAGRAPH 364: Endo admits that doctors sometimes served as consultants or on its advisory board. Except as expressly admitted, Endo denies the allegations in Paragraph 364 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 364 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 365: Endo denies the allegations in Paragraph 365 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 365 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 366: Endo denies the allegations in Paragraph 366 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 366 and denies them on that basis.

ANSWER TO PARAGRAPH 367: Endo denies the allegations in Paragraph 367 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 367 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 368: Endo admits that it has at times provided funding to Perry Fine. Except as expressly admitted, Endo denies the allegations in Paragraph 368 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 368 and denies them on that basis.

ANSWER TO PARAGRAPH 369: Endo denies the allegations in Paragraph 369 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 369 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 370: Endo denies the allegations in Paragraph 370 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 370 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 371: Endo denies the allegations in Paragraph 371 of the Complaint to the extent they refer to Endo and its purported conduct and denies that it promoted any false and misleading statements or that it encouraged others to make false and misleading statements. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 371 and denies them on that basis.

ANSWER TO PARAGRAPH 372: Paragraph 372 of the Complaint purports to characterize an article which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 372 and denies them on that basis.

ANSWER TO PARAGRAPH 373: Paragraph 373 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 374: Endo denies the allegations in Paragraph 374 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 374 and denies them on that basis.

ANSWER TO PARAGRAPH 375: Paragraph 375 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 375 and denies them on that basis.

ANSWER TO PARAGRAPH 376: Endo denies the allegations in Paragraph 376 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 376 and denies them on that basis.

ANSWER TO PARAGRAPH 377: Paragraph 377 of the Complaint purports to characterize various writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 377 and denies them on that basis.

ANSWER TO PARAGRAPH 378: Paragraph 378 of the Complaint purports to characterize a publication which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 379: Paragraph 379 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 380: Endo admits that articles discussing oxymorphone and oxymorphone ER were published in a supplemental issue of *Pain Medicine* but denies that those articles improperly touted Opana ER. Except as expressly admitted, Endo denies the allegations in Paragraph 380 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 380 and denies them on that basis.

ANSWER TO PARAGRAPH 381: Paragraph 381 of the Complaint purports to characterize a screening tool and website which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 381 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 381 and denies them on that basis.

ANSWER TO PARAGRAPH 382: Endo denies the allegations in Paragraph 382 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 382 and denies them on that basis.

ANSWER TO PARAGRAPH 383: Paragraph 383 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 383 and denies them on that basis.

ANSWER TO PARAGRAPH 384: Paragraph 384 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 384 and denies them on that basis.

ANSWER TO PARAGRAPH 385: Endo admits that it has at times provided funding to Perry Fine. Except as expressly admitted, Endo denies the allegations in Paragraph 385 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 385 and denies them on that basis.

ANSWER TO PARAGRAPH 386: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 386 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 387: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 387 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 388: Paragraph 388 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 389: Paragraph 389 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 389 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 390: Paragraph 390 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 390 and denies them on that basis.

ANSWER TO PARAGRAPH 391: Paragraph 391 of the Complaint purports to characterize a video which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 392: Paragraph 392 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 392 and denies them on that basis.

ANSWER TO PARAGRAPH 393: Paragraph 393 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 394: Paragraph 394 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 395: Paragraph 395 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 396: Paragraph 396 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 397: Endo denies the allegations in Paragraph 397 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 397 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 398: Endo denies the allegations in Paragraph 398 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 398 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 399: Endo admits that continuing medical education programs, also referred to as CMEs, may provide ongoing education to doctors, and further admits that CME content is sometimes delivered through in-person settings, via online programming, or through other written publications. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 399 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 400: Endo denies the allegations in Paragraph 400 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 400 and denies them on that basis.

ANSWER TO PARAGRAPH 401: Endo denies the allegations in Paragraph 401 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 401 and denies them on that basis.

ANSWER TO PARAGRAPH 402: Paragraph 402 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 402 and denies them on that basis.

ANSWER TO PARAGRAPH 403: Paragraph 403 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 403 and denies them on that basis.

ANSWER TO PARAGRAPH 404: Paragraph 404 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 404 and denies them on that basis.

ANSWER TO PARAGRAPH 405: Endo admits that it purchased copies of the book *Responsible Opioid Prescribing* and that it made copies of the book available to appropriate physicians. Paragraph 405 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 405 and denies them on that basis.

ANSWER TO PARAGRAPH 406: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 406 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 407: Paragraph 407 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 408: Endo denies the allegations in Paragraph 408 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 408 and denies them on that basis.

ANSWER TO PARAGRAPH 409: Endo denies the allegations in Paragraph 409 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 409 and denies them on that basis.

ANSWER TO PARAGRAPH 410: Endo admits that it has at times advertised in medical publications. Except as expressly admitted, Endo denies the allegations in Paragraph 410 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 410 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 411: Endo admits that it has at times made available to prescribers pamphlets or other materials that prescribers could make available to appropriate patients at their discretion. Paragraph 411 of the Complaint purports to characterize studies which speak for themselves, and Endo denies Plaintiff's characterization of them. Except as expressly admitted, Endo denies the allegations in Paragraph 411 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 411 to the extent they refer to other defendants and denies them on that basis..

ANSWER TO PARAGRAPH 412: Endo admits that advertisements for a specific medication and its indication should include possible side effects and contraindications and are subject to FDA review. Endo denies Plaintiff's characterization of unbranded advertising, denies any insinuation that Endo inappropriately promoted opioid medications through unbranded advertising, and denies the allegations in Paragraph 412 of the Complaint and the heading

preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 412 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 413: Endo denies the allegations in Paragraph 413 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 413 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 414: Endo denies the allegations in Paragraph 414 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 414 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 415: Endo denies the allegations in Paragraph 415 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 415 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 416: Endo denies the allegations in Paragraph 416 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 416 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 417: Paragraph 417 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 417 to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 417 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 418: Endo denies the allegations in Paragraph 418 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 418 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 419: Paragraph 419 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 419 and denies them on that basis.

ANSWER TO PARAGRAPH 420: Endo denies the allegations in Paragraph 420 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 420 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 421: Endo admits that at times it promoted certain opioid medications through its sales representatives and that at times it had promotional speakers' programs for certain opioid medications. Except as expressly admitted, Endo denies the allegations in Paragraph 421 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 421 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 422: Endo admits that it has at times taken into account prescribers' specialties and prescription data to inform its detailing decisions. Endo denies the remaining allegations in Paragraph 422 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 422 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 423: Endo denies the allegations in Paragraph 423 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 423 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 424: Paragraph 424 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 424 and denies them on that basis.

ANSWER TO PARAGRAPH 425: Endo denies the allegations in Paragraph 425 of the Complaint.

ANSWER TO PARAGRAPH 426: Paragraph 426 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 426 and denies them on that basis.

ANSWER TO PARAGRAPH 427: Paragraph 427 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 427 and denies them on that basis.

ANSWER TO PARAGRAPH 428: Paragraph 428 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 428 and denies them on that basis.

ANSWER TO PARAGRAPH 429: Paragraph 429 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 429 and denies them on that basis.

ANSWER TO PARAGRAPH 430: Endo admits that it held speakers' programs relating to Opana ER and provided honoraria to those speakers. Except as expressly admitted, Endo denies Plaintiff's characterization of the speaker programs and denies the allegations in Paragraph 430 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 430 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 431: Paragraph 431 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 431 and denies them on that basis.

ANSWER TO PARAGRAPH 432: Paragraph 432 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 432 and denies them on that basis.

ANSWER TO PARAGRAPH 433: The allegations in Paragraph 433 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that pharmaceutical manufacturers should communicate accurate and truthful information about the approved use of their medications and the risks safety, and efficacy of those medications. Endo denies any insinuation that its conduct did not comport with this principle and denies the allegations in Paragraph 433 and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 433 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 434: The allegations in Paragraph 434 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 434 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 434 and denies them on that basis.

ANSWER TO PARAGRAPH 435: The allegations in Paragraph 435 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 435 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 435 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 436: The allegations in Paragraph 436 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 436 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 436 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 437: Endo denies the allegations in Paragraph 437 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 437 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 438: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 438 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 439: Endo admits that it has at times provided funding for CMEs and independent educational grant funding to NIPC. Paragraph 439 of the Complaint purports to characterize guidelines and a CME which speak for themselves, and Endo denies Plaintiff's characterization of them. Except as expressly admitted, Endo denies the allegations in Paragraph 467 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 467 and denies them on that basis.

ANSWER TO PARAGRAPH 440: Paragraph 440 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of

them. Endo denies the allegations in Paragraph 440 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 440 and denies them on that basis.

ANSWER TO PARAGRAPH 441: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 441 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 442: Paragraph 442 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 442 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 442 and denies them on that basis.

ANSWER TO PARAGRAPH 443: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 443 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 444: Paragraph 444 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 444 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 445: Paragraph 445 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 445 and denies them on that basis.

ANSWER TO PARAGRAPH 446: Paragraph 446 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 446 and denies them on that basis.

ANSWER TO PARAGRAPH 447: Paragraph 447 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 447 and denies them on that basis.

ANSWER TO PARAGRAPH 448: Paragraph 448 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 448 and denies them on that basis.

ANSWER TO PARAGRAPH 449: Paragraph 449 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 449 and denies them on that basis.

ANSWER TO PARAGRAPH 450: Paragraph 450 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 450 and denies them on that basis.

ANSWER TO PARAGRAPH 451: Paragraph 451 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 451 and denies them on that basis.

ANSWER TO PARAGRAPH 452: Paragraph 452 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 452 and denies them on that basis.

ANSWER TO PARAGRAPH 453: Paragraph 453 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 453 and denies them on that basis.

ANSWER TO PARAGRAPH 454: Paragraph 454 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 454 and denies them on that basis.

ANSWER TO PARAGRAPH 455: Paragraph 455 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 455 and denies them on that basis.

ANSWER TO PARAGRAPH 456: Paragraph 456 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 456 and denies them on that basis.

ANSWER TO PARAGRAPH 457: Paragraph 457 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 457 and denies them on that basis.

ANSWER TO PARAGRAPH 458: Paragraph 458 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 458 and denies them on that basis.

ANSWER TO PARAGRAPH 459: Endo denies the allegations in Paragraph 459 of the Complaint and the headings preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 459 and the headings preceding it and denies them on that basis

ANSWER TO PARAGRAPH 460: Endo admits that it has at times promoted certain prescription opioid medications through its sales representatives. Paragraph 460 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Except as expressly admitted, Endo denies the allegations in Paragraph 460 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 460 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 461: Paragraph 461 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 461 and denies them on that basis.

ANSWER TO PARAGRAPH 462: Endo admits that it at times monitored prescribing data and conducted market research. Except as expressly admitted, Endo denies the allegations in Paragraph 462 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 462 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 463: Paragraph 463 of the Complaint purports to characterize studies which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 463 and denies them on that basis.

ANSWER TO PARAGRAPH 464: Endo admits that Endo Pharmaceuticals Inc. has marketed certain prescription opioid medications. Except as expressly admitted, Endo denies the allegations in Paragraph 464 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 464 and denies them on that basis.

ANSWER TO PARAGRAPH 465: Endo denies the allegations in Paragraph 465 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 465 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 466: Paragraph 466 of the Complaint purports to characterize a study which speaks for itself, and Endo denies Plaintiff's characterization of it.

Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 466 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 467: Paragraph 467 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 467 and denies them on that basis.

ANSWER TO PARAGRAPH 468: Paragraph 468 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 469: Endo denies the allegations in Paragraph 469 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 469 and the heading preceding and denies them on that basis.

ANSWER TO PARAGRAPH 470: Paragraph 470 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 470 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 470 and denies them on that basis.

ANSWER TO PARAGRAPH 471: Paragraph 471 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 471 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 471 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 472: Paragraph 472 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 472 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 472 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 473: Paragraph 473 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 473 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 473 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 474: The allegations in Paragraph 474 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 474 and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 474 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 475: Endo denies the allegations in Paragraph 475 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 475 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 476: The allegations in Paragraph 476 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that Defendants cannot engage in the unlawful sale of controlled substances and that there are laws and regulations that govern the manufacture and distribution of controlled substances. Endo denies any insinuation that its conduct did not comport with these principles and denies the remaining allegations in Paragraph 476 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 476 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 477: The allegations in Paragraph 477 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that federal law and regulations require certain parties to register as manufacturers or distributors of controlled substances under certain circumstances but denies the remaining allegations to the extent they purport to characterize the federal law and regulations. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 477 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 478: Endo denies that it engaged in a marketing scheme and denies the remaining allegations in Paragraph 478 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 478 and denies them on that basis.

ANSWER TO PARAGRAPH 479: Paragraph 479 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 480: The allegations in Paragraph 480 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that there are laws and regulations that govern the manufacture and distribution of controlled substances. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 480 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 481: The allegations in Paragraph 481 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies Plaintiff's characterization of the law and denies the remaining allegations in Paragraph 481 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 481 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 482: The allegations in Paragraph 482 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that information conveyed by pharmaceutical manufacturers should be accurate and truthful. Endo denies any insinuation that its conduct did not comport with this principle. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 482 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 483: Paragraph 483 of the Complaint purports to characterize statutes and regulations which speak for themselves, and Endo denies Plaintiff's characterization of them. The remaining allegations in Paragraph 483 contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the

allegations in Paragraph 483 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 483 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 484: The allegations in Paragraph 484 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 484, which refer to unspecified state laws, and denies them on that basis.

ANSWER TO PARAGRAPH 485: The allegations in Paragraph 485 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies Plaintiff's characterization of the statute and regulations and denies any insinuation that its conduct failed to conform to the requirements of the Controlled Substances Act ("CSA") and implementing regulations. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 485 and denies them on that basis.

ANSWER TO PARAGRAPH 486: The allegations in Paragraph 486 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that the CSA imposes certain obligations with respect to the manufacture and distribution of controlled substances but denies the remaining allegations in Paragraph 486 to the extent they purport to characterize the CSA.

ANSWER TO PARAGRAPH 487: The allegations in Paragraph 487 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that the DEA establishes annual quotas with respect to certain controlled

substances but denies the remaining allegations in Paragraph 487 to the extent they purport to characterize the law.

ANSWER TO PARAGRAPH 488: The allegations in Paragraph 488 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that the DEA establishes quotas with respect to certain controlled substances but denies the remaining allegations in Paragraph 488 to the extent they purport to characterize the law.

ANSWER TO PARAGRAPH 489: The allegations in Paragraph 489 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that the CSA and corresponding regulations impose certain obligations with respect to the manufacture and distribution of controlled substances but denies the remaining allegations in Paragraph 489 to the extent they purport to characterize the law.

ANSWER TO PARAGRAPH 490: The allegations in Paragraph 490 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that the CSA and corresponding regulations impose certain obligations with respect to the manufacture and distribution of controlled substances but denies the allegations in Paragraph 490 to the extent they characterize the law.

ANSWER TO PARAGRAPH 491: The allegations in Paragraph 491 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies the remaining allegations in Paragraph 491 to the extent they purport to characterize the law.

ANSWER TO PARAGRAPH 492: The allegations in Paragraph 492 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies the remaining allegations in Paragraph 492 to the extent they purport to characterize the law.

ANSWER TO PARAGRAPH 493: The allegations in Paragraph 493 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies the remaining allegations in Paragraph 493 to the extent they purport to characterize the law.

ANSWER TO PARAGRAPH 494: Paragraph 494 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 494 and denies them on that basis.

ANSWER TO PARAGRAPH 495: Endo admits that it has at times purchased prescription data from IMS and other sources and that it at times had sales representatives who conducted detailing visits to prescribers and pharmacies to provide information about Endo's medications. Except as expressly admitted, Endo denies the allegations in Paragraph 495 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 495 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 496: The allegations in Paragraph 496 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Endo admits that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies the allegations in Paragraph 496 to the extent they purport to characterize the law.

ANSWER TO PARAGRAPH 497: The allegations in Paragraph 497 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 497 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 497 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 498: The allegations in Paragraph 498 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that there are laws and regulations that govern the distribution of controlled substances but denies the allegations in Paragraph 498 to the extent they purport to characterize the law. Endo denies the allegations in Paragraph 498 and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 498 and denies them on that basis.

ANSWER TO PARAGRAPH 499: The allegations in Paragraph 499 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that there are laws and regulations that govern the manufacture and distribution of controlled substances but denies any insinuation that Endo failed to comply with its obligations. Endo lacks knowledge or information sufficient to form a belief as to the truth of

the allegations in Paragraph 499 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 500: Paragraph 500 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 500 and denies them on that basis.

ANSWER TO PARAGRAPH 501: Paragraph 501 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 501 and denies them on that basis.

ANSWER TO PARAGRAPH 502: Endo admits that there are laws and regulations that govern the manufacture and distribution of controlled substances that are administered by the DEA. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 502 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 503: Paragraph 503 of the Complaint purports to characterize a letter which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 504: Paragraph 504 of the Complaint purports to characterize a letter which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 505: Paragraph 505 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 505 and denies them on that basis.

ANSWER TO PARAGRAPH 506: Paragraph 506 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 506 and denies them on that basis.

ANSWER TO PARAGRAPH 507: Paragraph 507 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 507 and denies them on that basis.

ANSWER TO PARAGRAPH 508: Paragraph 508 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 508 and denies them on that basis.

ANSWER TO PARAGRAPH 509: Paragraph 509 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 509 and denies them on that basis.

ANSWER TO PARAGRAPH 510: Paragraph 510 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 510 and denies them on that basis.

ANSWER TO PARAGRAPH 511: Paragraph 511 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 511 and denies them on that basis.

ANSWER TO PARAGRAPH 512: Paragraph 512 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 512 and denies them on that basis.

ANSWER TO PARAGRAPH 513: Endo denies the allegations in Paragraph 513 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 513 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 514: Endo admits that wholesale distributors have purchased its prescription medications. Paragraph 514 of the Complaint purports to characterize a court ruling which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 514 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 514 and denies them on that basis.

ANSWER TO PARAGRAPH 515: Endo admits that wholesale distributors may purchase pharmaceutical medications from pharmaceutical companies and that pharmaceutical companies may offer discounts or rebates to wholesale distributors. Endo further admits that it has at times paid rebates or chargebacks to wholesale distributors with respect to certain prescription opioid medications. Except as expressly admitted, Endo denies the allegations in Paragraph 515 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge

or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 515 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 516: Paragraph 516 of the Complaint purports to characterize contracts and legal requirements which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 516 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 516 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 517: Endo admits that it has at times participated in the PCF and the HDA and that these organizations have included a variety of stakeholders. Except as expressly admitted, Endo denies the allegations in Paragraph 517 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 517 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 518: Endo denies the allegations in Paragraph 518 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 518 and denies them on that basis.

ANSWER TO PARAGRAPH 519: Paragraph 519 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 520: Endo admits that it has at times participated in the PCF and that the PCF has included a variety of stakeholders. Except as expressly admitted, Endo denies the allegations in Paragraph 520 of the Complaint to the extent they refer to Endo

and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 520 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 521: Endo admits that it has at times been a member of HDA. Paragraph 521 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 521 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 521 and denies them on that basis.

ANSWER TO PARAGRAPH 522: Paragraph 522 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 522 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 522 and denies them on that basis.

ANSWER TO PARAGRAPH 523: Paragraph 523 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 524: Paragraph 524 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 525: Endo denies the allegations in Paragraph 525 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 525 and denies them on that basis.

ANSWER TO PARAGRAPH 526: Paragraph 526 of the Complaint purports to characterize a website which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 526 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 526 and denies them on that basis.

ANSWER TO PARAGRAPH 527: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 527 and denies them on that basis.

ANSWER TO PARAGRAPH 528: Endo denies the allegations in Paragraph 528 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 528 and denies them on that basis.

ANSWER TO PARAGRAPH 529: Endo denies the allegations in Paragraph 529 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 529 and denies them on that basis.

ANSWER TO PARAGRAPH 530: Endo denies the allegations in Paragraph 530 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 530 and denies them on that basis.

ANSWER TO PARAGRAPH 531: Paragraph 531 of the Complaint purports to characterize various writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 531 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief

as to the truth of the allegations in Paragraph 531 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 532: Endo denies the allegations in Paragraph 532 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 532 and denies them on that basis.

ANSWER TO PARAGRAPH 533: Endo denies the allegations in Paragraph 533 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 533 and denies them on that basis.

ANSWER TO PARAGRAPH 534: Endo denies the allegations in Paragraph 534 of the Complaint to the extent they refer to Endo and its purported conduct and. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 534 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 535: Endo denies the allegations in Paragraph 535 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 535 and denies them on that basis.

ANSWER TO PARAGRAPH 536: Paragraph 536 of the Complaint purports to characterize a statute which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 536 to the extent they refer to Endo or its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 536 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 537: Endo denies the allegations in Paragraph 537 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 537 and denies them on that basis.

ANSWER TO PARAGRAPH 538: Endo denies the allegations in Paragraph 538 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 537 and denies them on that basis.

ANSWER TO PARAGRAPH 539: Paragraph 539 of the Complaint purports to characterize data which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 539 and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 539 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 540: Endo denies the allegations in Paragraph 540 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 540 and denies them on that basis.

ANSWER TO PARAGRAPH 541: The allegations in subpart (d) of Paragraph 541 of the Complaint concern a defendant other than Endo, so Endo is not required to respond. To the

extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in subpart (d) and denies them on that basis.

With respect to subparts (a) - (c) and (e) of Paragraph 541, Endo responds as follows:

(a) and (b) Endo admits that it has at times purchased and used prescriber-level data for certain prescription opioid medications. Except as expressly admitted, Endo denies the allegations in subparts (a) and (b) to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in subparts (a) and (b) to the extent they refer to other defendants and denies them on that basis.

(c) Endo admits that its sales representatives have at times conducted in-person visits and communicated in-person with doctors. Endo further admits that its sales representatives are required to report suspected diversion to the company in accordance with company policy. Except as expressly admitted, Endo denies the allegations in subpart (c) to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in subpart (c) to the extent they refer to other defendants and denies them on that basis.

(e) Endo denies the allegations in subpart (e) to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in subpart (e) to the extent they refer to the other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 542: Endo denies the allegations in Paragraph 542 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 542 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 543: Endo admits that it has at times obtained data relating to the prescribing of opioid medications from various third-party vendors. Except as expressly admitted, Endo denies the allegations in Paragraph 558 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 558 and denies them on that basis.

ANSWER TO PARAGRAPH 544: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 544 and denies them on that basis.

ANSWER TO PARAGRAPH 545: Endo admits that it has at times purchased prescriber-level data for certain medications. Paragraph 545 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 545 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 545 and denies them on that basis.

ANSWER TO PARAGRAPH 546: Endo admits that it has at times purchased prescriber-level data for certain medications from IMS Health. Paragraph 546 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 546 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 546 and denies them on that basis.

ANSWER TO PARAGRAPH 547: Endo admits that it at times purchased prescription data from various third-party vendors. Paragraph 547 of the Complaint purports to characterize a

writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 547 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 547 and denies them on that basis.

ANSWER TO PARAGRAPH 548: Paragraph 548 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 548 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 548 and denies them on that basis.

ANSWER TO PARAGRAPH 549: Endo denies the allegations in Paragraph 549 of the Complaint.

ANSWER TO PARAGRAPH 550: Paragraph 550 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 550 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 550 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 551: Endo admits that its sales representatives are required to report suspected diversion to the company in accordance with company policy. Paragraph 551 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the allegations in Paragraph 551 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information

sufficient to form a belief as to the truth of the remaining allegations in Paragraph 551 to the extent they refer to other defendants and denies them on that basis

ANSWER TO PARAGRAPH 552: Endo denies the allegations in the first sentence of Paragraph 552 of the Complaint to the extent they refer to Endo and its purported conduct. The remaining allegations in Paragraph 552 concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 552 and denies them on that basis.

ANSWER TO PARAGRAPH 553: Paragraph 553 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 553 and denies them on that basis.

ANSWER TO PARAGRAPH 554: Paragraph 554 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 554 and denies them on that basis.

ANSWER TO PARAGRAPH 555: Endo denies the allegations in Paragraph 555 of the Complaint to the extent they refer to Endo and its purported conduct and further denies any insinuation that Endo subscribes to the position alleged in the last sentence of Paragraph 555. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 555 and denies them on that basis.

ANSWER TO PARAGRAPH 556: Endo admits that it has at times considered prescription and specialty data purchased from third party vendors to inform detailing decisions.

Except as expressly admitted, Endo denies the allegations in Paragraph 556 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 556 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 557: Paragraph 557 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 557 and denies them on that basis..

ANSWER TO PARAGRAPH 558: Paragraph 558 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 558 and denies them on that basis.

ANSWER TO PARAGRAPH 559: Endo denies the allegations in Paragraph 559 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 559 and denies them on that basis.

ANSWER TO PARAGRAPH 560: Endo admits that there is an illegal and illicit drug market facilitating misuse and abuse of opioids. Except as expressly admitted, Endo denies the allegations in the first sentence of Paragraph 560 of the Complaint to the extent they refer to Endo and its purported conduct. The remaining allegations in Paragraph 560 concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 560 and denies them on that basis.

ANSWER TO PARAGRAPH 561: Endo denies the allegations in the first sentence of Paragraph 561 of the Complaint to the extent they refer to Endo and its purported conduct. The remaining allegations in Paragraph 561 concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 561 and denies them on that basis.

ANSWER TO PARAGRAPH 562: Endo admits that, as disclosed in the FDA-approved label, Opana ER exposed users to the risks of addiction, abuse, and misuse. The allegations in the second sentence of Paragraph 562 of the Complaint purport to characterize the AOD which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 563: Endo denies the allegations in Paragraph 563 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 563 and denies them on that basis..

ANSWER TO PARAGRAPH 564: The allegations in Paragraph 564 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 564 and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 564 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 565: Endo denies the allegations in Paragraph 565 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 565 and denies them on that basis.

ANSWER TO PARAGRAPH 566: Paragraph 566 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 566 and denies them on that basis.

ANSWER TO PARAGRAPH 567: Paragraph 567 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 567 and denies them on that basis.

ANSWER TO PARAGRAPH 568: Paragraph 568 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 568 and denies them on that basis.

ANSWER TO PARAGRAPH 569: Paragraph 569 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 569 and denies them on that basis.

ANSWER TO PARAGRAPH 570: Paragraph 570 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 570 and denies them on that basis.

ANSWER TO PARAGRAPH 571: Endo denies the allegations in Paragraph 571 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 571 and denies them on that basis.

ANSWER TO PARAGRAPH 572: The allegations in Paragraph 572 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 572 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 572 and denies them on that basis.

ANSWER TO PARAGRAPH 573: Endo admits that there is an illegal drug market facilitating misuse and abuse of opioids, but denies any insinuation that Endo's conduct was unlawful or that its conduct contributed to the illegal market. Endo further denies the allegations in the heading to Paragraph 573 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 573 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 574: Paragraph 574 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks 574 or information sufficient to form a belief as to the truth of the allegations in Paragraph 574 and denies them on that basis.

ANSWER TO PARAGRAPH 575: Paragraph 575 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 575 and denies them on that basis.

ANSWER TO PARAGRAPH 576: Paragraph 576 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 576 and denies them on that basis.

ANSWER TO PARAGRAPH 577: Paragraph 577 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 577 and denies them on that basis.

ANSWER TO PARAGRAPH 578: Paragraph 578 of the Complaint purport to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 578 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 578 and denies them on that basis.

ANSWER TO PARAGRAPH 579: Paragraph 579 of the Complaint purports to characterize a writing which speak for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 579 and denies them on that basis. By way of further response, Endo understands its obligations under applicable law and has complied accordingly.

ANSWER TO PARAGRAPH 580: Paragraph 580 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 580 and denies them on that basis.

ANSWER TO PARAGRAPH 581: Endo denies the allegations in the first sentence of Paragraph 581 of the Complaint to the extent they refer to Endo and its purported conduct. The remaining allegations in Paragraph 581 concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 581 and denies them on that basis.

ANSWER TO PARAGRAPH 582: Paragraph 582 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 582 and denies them on that basis.

ANSWER TO PARAGRAPH 583: Paragraph 583 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 583 and denies them on that basis.

ANSWER TO PARAGRAPH 584: Paragraph 584 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 584 and denies them on that basis.

ANSWER TO PARAGRAPH 585: Endo denies the allegations in Paragraph 585 of the Complaint to the extent they refer to Endo and its purported conduct and denies that it violated any legal duties or did not act responsibly. Endo lacks knowledge or information sufficient to

form a belief as to the truth of the remaining allegations in Paragraph 585 and denies them on that basis.

ANSWER TO PARAGRAPH 586: Paragraph 586 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 586 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 587: Paragraph 587 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 587 and denies them on that basis.

ANSWER TO PARAGRAPH 588: Paragraph 588 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 588 and denies them on that basis.

ANSWER TO PARAGRAPH 589: Endo denies the allegations in Paragraph 589 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 589 and denies them on that basis..

ANSWER TO PARAGRAPH 590: The allegations in Paragraph 590 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that there are laws and regulations that govern the

manufacture and distribution of controlled substances but denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 591: The allegations in Paragraph 591 of the Complaint contain legal conclusions or arguments that require no answer. Paragraph 591 purports to characterize sections of the CSA which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 591 and denies them on that basis.

ANSWER TO PARAGRAPH 592: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 592 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 593: The allegations in Paragraph 593 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 593 and denies them on that basis.

ANSWER TO PARAGRAPH 594: The allegations in Paragraph 594 of the Complaint contain legal conclusions or arguments that require no answer. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 594 and denies them on that basis.

ANSWER TO PARAGRAPH 595: The allegations in Paragraph 595 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 595 and denies them on that basis.

ANSWER TO PARAGRAPH 596: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 596 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 597: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 597 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 598: Paragraph 598 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 598 and denies them on that basis.

ANSWER TO PARAGRAPH 599: Paragraph 599 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 599 and denies them on that basis.

ANSWER TO PARAGRAPH 600: Paragraph 600 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 600 and denies them on that basis.

ANSWER TO PARAGRAPH 601: Paragraph 601 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 601 and denies them on that basis.

ANSWER TO PARAGRAPH 602: Paragraph 602 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 602 and denies them on that basis.

ANSWER TO PARAGRAPH 603: Paragraph 603 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603 and denies them on that basis.

ANSWER TO PARAGRAPH 604: Paragraph 604 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604 and denies them on that basis.

ANSWER TO PARAGRAPH 605: Paragraph 605 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 605 and denies them on that basis.

ANSWER TO PARAGRAPH 606: Paragraph 606 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 606 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 607: Endo denies the allegations in Paragraph 607 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 607 and denies them on that basis.

ANSWER TO PARAGRAPH 608: Paragraph 608 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 608 and denies them on that basis.

ANSWER TO PARAGRAPH 609: Paragraph 609 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 609 and denies them on that basis.

ANSWER TO PARAGRAPH 610: Paragraph 610 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 610 and denies them on that basis.

ANSWER TO PARAGRAPH 611: Paragraph 611 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 611 and denies them on that basis.

ANSWER TO PARAGRAPH 612: Paragraph 612 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 612 and denies them on that basis.

ANSWER TO PARAGRAPH 613: Paragraph 613 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 613 and denies them on that basis.

ANSWER TO PARAGRAPH 614: Paragraph 614 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 614 and denies them on that basis.

ANSWER TO PARAGRAPH 615: Paragraph 615 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 615 and denies them on that basis.

ANSWER TO PARAGRAPH 616: Paragraph 616 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 616 and denies them on that basis.

ANSWER TO PARAGRAPH 617: Paragraph 617 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 617 and denies them on that basis.

ANSWER TO PARAGRAPH 618: Paragraph 618 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 618 and denies them on that basis.

ANSWER TO PARAGRAPH 619: Paragraph 619 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619 and denies them on that basis.

ANSWER TO PARAGRAPH 620: Paragraph 620 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 620 and denies them on that basis.

ANSWER TO PARAGRAPH 621: Paragraph 621 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 621 and denies them on that basis.

ANSWER TO PARAGRAPH 622: Paragraph 622 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622 and denies them on that basis.

ANSWER TO PARAGRAPH 623: Paragraph 623 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 623 and denies them on that basis.

ANSWER TO PARAGRAPH 624: Paragraph 624 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 624 and denies them on that basis.

ANSWER TO PARAGRAPH 625: Paragraph 625 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 625 and denies them on that basis.

ANSWER TO PARAGRAPH 626: Paragraph 626 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 626 and denies them on that basis.

ANSWER TO PARAGRAPH 627: Paragraph 627 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 627 and denies them on that basis.

ANSWER TO PARAGRAPH 628: Paragraph 628 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 628 and denies them on that basis.

ANSWER TO PARAGRAPH 629: Paragraph 629 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 629 and denies them on that basis.

ANSWER TO PARAGRAPH 630: Paragraph 630 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 630 and denies them on that basis.

ANSWER TO PARAGRAPH 631: Paragraph 631 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 631 and denies them on that basis.

ANSWER TO PARAGRAPH 632: Paragraph 632 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 632 and denies them on that basis.

ANSWER TO PARAGRAPH 633: Paragraph 633 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 633 and denies them on that basis.

ANSWER TO PARAGRAPH 634: Paragraph 634 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 634 and denies them on that basis.

ANSWER TO PARAGRAPH 635: Paragraph 635 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 635 and denies them on that basis.

ANSWER TO PARAGRAPH 636: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 636 of the Complaint and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 637: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 637 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 638: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 638 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 639: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 639 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 640: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 640 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 641: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 641 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 642: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 642 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 643: Paragraph 643 of the Complaint purport to characterize a court ruling which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 643 and denies them on that basis.

ANSWER TO PARAGRAPH 644: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 644 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 645: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 645 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 646: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 646 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 647: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 647 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 648: Endo denies the allegations in Paragraph 648 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 648 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 649: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 649 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 650: Endo denies the allegations in Paragraph 650 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 650 and denies them on that basis.

ANSWER TO PARAGRAPH 651: Endo denies the allegations in Paragraph 651 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 651 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 652: The allegations in Paragraph 652 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Paragraph 652 purports to characterize Montana statutes and regulations which speak for themselves. Endo denies Plaintiff's characterization of the laws and further denies the allegation in the heading preceding Paragraph 652 to the extent it refers to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegation in the heading preceding Paragraph 652 to the extent it refers to other defendants and denies it on that basis.

ANSWER TO PARAGRAPH 653: The allegations in Paragraph 653 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Paragraph 653 purports to characterize a Montana statute which speaks for itself, and denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 654: Endo denies the allegations in Paragraph 654 of the Complaint and the heading preceding it to the extent that they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 654 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 655: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 655 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 656: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 656 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 657: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 657 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 658: Endo denies the allegations in the first sentence of Paragraph 658 of the Complaint to the extent that they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 658 and Endo denies them on that basis.

ANSWER TO PARAGRAPH 659: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 659 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 660: Paragraph 660 of the Complaint purports to characterize certain testimony which speaks for itself, and Endo denies Plaintiff's

characterization of it. Endo denies the allegations in Paragraph 660 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 660 and denies them on that basis.

ANSWER TO PARAGRAPH 661: Paragraph 661 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 662: Paragraph 662 of the Complaint purports to characterize a study which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 663: Paragraph 663 of the Complaint purports to characterize an article which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 663 and denies them on that basis.

ANSWER TO PARAGRAPH 664: Paragraph 664 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 665: Endo admits that wholesale distributors may purchase pharmaceutical medications from pharmaceutical companies and that pharmaceutical companies may offer discounts or rebates to wholesale distributors. Except as expressly admitted, Endo denies the allegations in Paragraph 665 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 665 and denies them on that basis.

ANSWER TO PARAGRAPH 666: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 666 of the complaint and denies them on that basis.

ANSWER TO PARAGRAPH 667: Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 667 and denies them on that basis.

ANSWER TO PARAGRAPH 668: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 668 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 669: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 669 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 670: Endo denies the allegations in Paragraph 670 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 670 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 671: Endo admits that it has at times taken into account prescribers' specialties and prescription data to inform its detailing decisions. Except as expressly admitted, Endo denies the allegations in Paragraph 671 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 671 and denies them on that basis.

ANSWER TO PARAGRAPH 672: Endo denies the allegations in the Paragraph 672 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 672 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 673: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 673 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 674: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 674 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 675: Endo denies the allegations in the first sentence of Paragraph 675 of the Complaint to the extent that they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 675 and denies them on that basis.

ANSWER TO PARAGRAPH 676: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 676 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 677: Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 677 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 678: Endo denies the allegations in the first sentence of Paragraph 678 of the Complaint to the extent that they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 678 and denies them on that basis.

ANSWER TO PARAGRAPH 679: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 679 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 680: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 680 of the Complaint and denies them on that basis..

ANSWER TO PARAGRAPH 681: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 681 of the Complaint and the heading preceding it and denies them on the basis.

ANSWER TO PARAGRAPH 682: Paragraph 682 of the Complaint purports to characterize a study which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 683: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 683 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 684: Paragraph 684 of the Complaint purports to characterize writings which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 684 and denies them on that basis.

ANSWER TO PARAGRAPH 685: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 685 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 686: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 686 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 687: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 687 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 688: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 688 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 689: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 689 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 690: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 690 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 691: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 691 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 629: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 692 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 693: Paragraph 693 of the Complaint purports to characterize a statement which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 694: Endo denies the allegations in Paragraph 694 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 694 and denies them on that basis.

ANSWER TO PARAGRAPH 695: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 695 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 696: Paragraph 696 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 696 and denies them on that basis.

ANSWER TO PARAGRAPH 697: Paragraph 697 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 697 and denies them on that basis.

ANSWER TO PARAGRAPH 698: Paragraph 698 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 698 and denies them on that basis.

ANSWER TO PARAGRAPH 699: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 699 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 700: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 700 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 701: Endo denies the allegations in Paragraph 701 of the Complaint and the headings preceding it.

ANSWER TO PARAGRAPH 702: Endo denies the allegations in Paragraph 702 of the Complaint.

ANSWER TO PARAGRAPH 703: Endo denies the allegations in Paragraph 703 of the Complaint.

ANSWER TO PARAGRAPH 704: Endo denies the allegations in Paragraph 704 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 704 and denies them on that basis.

ANSWER TO PARAGRAPH 705: Endo denies the allegations in Paragraph 705 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 705 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 706: Endo denies the allegations in Paragraph 706 of the Complaint.

ANSWER TO PARAGRAPH 707: Endo denies the allegations in Paragraph 707 of the Complaint.

ANSWER TO PARAGRAPH 708: Endo denies the allegations in Paragraph 708 of the Complaint.

ANSWER TO PARAGRAPH 709: Endo denies the allegations in the first sentence of Paragraph 709 of the Complaint. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 709 and denies them on that basis.

ANSWER TO PARAGRAPH 710: Endo denies the allegations in Paragraph 710 of the Complaint.

ANSWER TO PARAGRAPH 711: Paragraph 711 of the Complaint purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 711.

ANSWER TO PARAGRAPH 712: Endo denies the allegations in Paragraph 712 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 712 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 713: The allegations in Paragraph 713 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Paragraph 713 purports to characterize a writing which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 713.

ANSWER TO PARAGRAPH 714: Endo denies the allegations in Paragraph 714 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct and further denies that there was an agreement or conspiracy among defendants. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 714 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 715: Endo denies the allegations in Paragraph 715 of the Complaint.

ANSWER TO PARAGRAPH 716: Endo denies the allegations in Paragraph 716 of the Complaint.

ANSWER TO PARAGRAPH 717: Endo denies the allegations in Paragraph 717 of the Complaint.

ANSWER TO PARAGRAPH 718: Endo denies the allegations in Paragraph 718 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 718 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 719: Endo denies the allegations in Paragraph 719 of the Complaint.

ANSWER TO PARAGRAPH 720: Endo denies the allegations in Paragraph 720 of the Complaint.

ANSWER TO PARAGRAPH 721: The allegations in Paragraph 721 of the Complaint and the headings preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it has engaged in unlawful actions, denies that Plaintiff is entitled to any relief from Endo, and denies the allegations in the heading preceding Paragraph 721.

ANSWER TO PARAGRAPH 722: The allegations in Paragraph 722 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 722 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 722 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 723: The allegations in Paragraph 723 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 723 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form

a belief as to the truth of the allegations in Paragraph 723 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 724: The allegations in Paragraph 724 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 724 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 724 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 725: Endo denies the allegations in Paragraph 725 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 725 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 726: Endo denies the allegations in Paragraph 726 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 726 and denies them on that basis.

ANSWER TO PARAGRAPH 727: The allegations in Paragraph 727 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 727 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 727 and denies them on that basis.

ANSWER TO PARAGRAPH 728: Endo denies the allegations of Paragraph 728 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or

information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 728 and denies them on that basis.

ANSWER TO PARAGRAPH 729: Paragraph 729 of the Complaint purports to characterize an order and court proceedings which speak for themselves, and Endo denies Plaintiff's characterization of them. Further, the allegations in Paragraph 729 contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 729 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 729 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 730: Endo denies the allegations of Paragraph 730 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 730 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 731: The allegations in Paragraph 731 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 731 and denies them on that basis.

ANSWER TO PARAGRAPH 732: Endo denies the allegations of Paragraph 732 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 732 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 733: Endo denies the allegations of Paragraph 733 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 733 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 734: The allegations in Paragraph 734 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 734 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 734 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 735: The allegations in Paragraph 735 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 735 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 735 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 736: Endo denies the allegations of Paragraph 736 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 736 and the heading preceding it to the extent they refer to other defendants and denies them on that basis..

ANSWER TO PARAGRAPH 737: Paragraph 737 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the

extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 737 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 738: Paragraph 738 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 738 and denies them on that basis.

ANSWER TO PARAGRAPH 739: Paragraph 739 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 739 and denies them on that basis.

ANSWER TO PARAGRAPH 740: Paragraph 740 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 740 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 741: Paragraph 741 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 741 and denies them on that basis.

ANSWER TO PARAGRAPH 742: Paragraph 742 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a

belief as to the truth of the allegations in Paragraph 742 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 743: Paragraph 743 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 743 and denies them on that basis.

ANSWER TO PARAGRAPH 744: Paragraph 744 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 744 and denies them on that basis.

ANSWER TO PARAGRAPH 745: Paragraph 745 of the Complaint and the heading preceding it concern a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 745 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 746: Paragraph 746 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 746 and denies them on that basis..

ANSWER TO PARAGRAPH 747: Endo denies the allegations in Paragraph 747 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 747 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 748: Paragraph 748 of the Complaint purports to characterize an interview which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 749: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 749 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 750: Paragraph 750 of the Complaint concerns defendants other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 750 and denies them on that basis.

ANSWER TO PARAGRAPH 751: Paragraph 751 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 751 and denies them on that basis.

ANSWER TO PARAGRAPH 752: Paragraph 752 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 752 and denies them on that basis.

ANSWER TO PARAGRAPH 753: Paragraph 753 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to

respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 753 and denies them on that basis.

ANSWER TO PARAGRAPH 754: Paragraph 754 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 754 and denies them on that basis.

ANSWER TO PARAGRAPH 755: Paragraph 755 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 755 and denies them on that basis.

ANSWER TO PARAGRAPH 756: Paragraph 756 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 756 and denies them on that basis.

ANSWER TO PARAGRAPH 757: Paragraph 757 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 757 and denies them on that basis.

ANSWER TO PARAGRAPH 758: Paragraph 758 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 758 and denies them on that basis.

ANSWER TO PARAGRAPH 759: Paragraph 759 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 759 and denies them on that basis.

ANSWER TO PARAGRAPH 760: Paragraph 760 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 760 and denies them on that basis.

ANSWER TO PARAGRAPH 761: Paragraph 761 of the Complaint concerns a defendant other than Endo, so Endo is not required to respond. To the extent Endo is required to respond, Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 761 and denies them on that basis.

ANSWER TO PARAGRAPH 762: Endo admits that it entered into an AOD with the New York Attorney General. Paragraph 762 of the Complaint purports to characterize the AOD, which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations in Paragraph 762 to the extent they refer to Endo and its purported conduct.

ANSWER TO PARAGRAPH 763: Endo denies the allegations in Paragraph 763 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 763 to the extent they refer to other defendants and denies them on that basis.

II. FACTS PERTAINING TO CLAIMS UNDER RACKETEER-INFLUENCED AND CORRUPT ORGANIZATIONS (“RICO”) ACT

ANSWER TO PARAGRAPH 764: The allegations in Paragraph 764 of the Complaint and the headings preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 764 and the headings preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 764 and the headings preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 765: The allegations in Paragraph 765 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 765 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 765 and denies them on that basis.

ANSWER TO PARAGRAPH 766: Endo denies the allegations in Paragraph 766 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 766 and denies them on that basis.

ANSWER TO PARAGRAPH 767: The allegations in Paragraph 767 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 767 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 767 and denies them on that basis.

ANSWER TO PARAGRAPH 768: The allegations in Paragraph 768 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Endo denies the allegations of Paragraph 768 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 768 and denies them on that basis.

ANSWER TO PARAGRAPH 769: The allegations in Paragraph 769 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 769 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 769 and denies them on that basis.

ANSWER TO PARAGRAPH 770: The allegations in Paragraph 770 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 770 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 770 and denies them on that basis.

ANSWER TO PARAGRAPH 771: Endo denies the allegations of Paragraph 771 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 771 and denies them on that basis.

ANSWER TO PARAGRAPH 772: The allegations in Paragraph 772 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 772 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 772 and denies them on that basis.

ANSWER TO PARAGRAPH 773: The allegations in Paragraph 773 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it engaged in an “opioid marketing enterprise” and denies the remaining allegations of Paragraph 773 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 773 and denies them on that basis.

ANSWER TO PARAGRAPH 774: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 774 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 775: Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 775 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 776: The allegations in Paragraph 776 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it engaged in an “opioid marketing enterprise” or that it sought to achieve a common purpose with other defendants. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 776 and denies them on that basis.

ANSWER TO PARAGRAPH 777: The allegations in Paragraph 777 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 777 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 777 and denies them on that basis.

ANSWER TO PARAGRAPH 778: The allegations in Paragraph 778 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 778 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 778 and denies them on that basis.

ANSWER TO PARAGRAPH 779: The allegations in Paragraph 779 of the Complaint, the subparts thereto, and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 779, all subparts thereto, and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 779, all subparts thereto, and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 780: The allegations in Paragraph 780 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 780 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 780 and denies them on that basis.

ANSWER TO PARAGRAPH 781: The allegations in Paragraph 781 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 781, and all subparts thereto, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 781, and all subparts thereto, and denies them on that basis.

ANSWER TO PARAGRAPH 782: Endo denies the allegations of Paragraph 782 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 782 and denies them on that basis.

ANSWER TO PARAGRAPH 783: The allegations in Paragraph 783 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 783, and all subparts thereto, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 783, and all subparts thereto, and denies them on that basis.

ANSWER TO PARAGRAPH 784: The allegations in Paragraph 784 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that it engaged in a “scheme” or “common course of action” with other defendants and further denies the allegations of Paragraph 784 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 784 to the extent they refer to other defendants and denies them on that basis..

ANSWER TO PARAGRAPH 785: Endo denies the allegations of Paragraph 785 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 785 and the heading preceding it and denies them on that basis.

ANSWER TO PARAGRAPH 786: Endo denies the allegations of Paragraph 786 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 786 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 787: Endo denies the allegations of Paragraph 787 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 787 to the extent they refer to other defendants and denies them on that basis..

ANSWER TO PARAGRAPH 788: The allegations in Paragraph 788 of the Complaint and the heading preceding it contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 788 of the Complaint and the heading preceding it to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 788 and the heading preceding it to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 789: The allegations in Paragraph 789 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 789 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 789 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 790: The allegations in Paragraph 790 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Endo denies the allegations of Paragraph 790 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 790 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 791: The allegations in Paragraph 791 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 791 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 791 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 792: The allegations in Paragraph 792 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 792 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 792 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 793: The allegations in Paragraph 793 of the Complaint, and all subparts thereto, contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 793, and all subparts thereto, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 793, and all subparts thereto, and denies them on that basis.

ANSWER TO PARAGRAPH 794: The allegations in Paragraph 794 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 794 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 794 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 795: The allegations in Paragraph 795 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 795 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 795 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 796: The allegations in Paragraph 796 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 796 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 796 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 797: The allegations in Paragraph 797 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 797 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 797 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 798: The allegations in Paragraph 798 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 798 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 798 and denies them on that basis.

ANSWER TO PARAGRAPH 799: The allegations in Paragraph 799 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 799 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 799 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 800: The allegations in Paragraph 800 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Paragraph 800 purports to characterize laws which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 800 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 800 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 801: The allegations in Paragraph 801 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that the CSA and corresponding regulations impose certain obligations

with respect to the manufacture and distribution of controlled substances but denies Plaintiff's characterization of those requirements. Endo denies the remaining allegations of Paragraph 801 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 801 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 802: The allegations in Paragraph 802 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Paragraph 802 purports to characterize laws which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations of Paragraph 802 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 802 denies them on that basis.

ANSWER TO PARAGRAPH 803: The allegations in Paragraph 803 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 803 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 803 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 804: The allegations in Paragraph 804 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 804 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 804 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 805: The allegations in Paragraph 805 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 805 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 805 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 806: Endo denies the allegations of Paragraph 806 of the Complaint, and all subparts thereto, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 806, and all subparts thereto, to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 807: Endo denies the allegations of Paragraph 807 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 807 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 808: Paragraph 808 of the Complaint purports to characterize laws that speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 809: The allegations in Paragraph 809 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 809 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 809 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 810: The allegations in Paragraph 810 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 810 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 810 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 811: The allegations in Paragraph 811 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 811 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 811 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 812: The allegations in Paragraph 812 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 812 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 812 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 813: The allegations in Paragraph 813 of the Complaint, and all subparts thereto, contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 813, and all subparts

thereto, to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 813, and all subparts thereto, to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 814: The allegations in Paragraph 814 of the Complaint and the accompanying table contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 814 and the accompanying table to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 814 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 815: Endo denies the allegations of Paragraph 815 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 815 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 816: The allegations in Paragraph 816 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 816 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 816 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 817: Endo denies the allegations of Paragraph 817 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 817 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 818: Paragraph 818 of the Complaint purports to characterize communications that speak for themselves, and Endo denies Plaintiff's characterization of them. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 818 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 819: The allegations in Paragraph 819 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 819 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 819 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 820: The allegations in Paragraph 820 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 820 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 820 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 821: The allegations in Paragraph 821 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 821 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 821 and denies them on that basis.

ANSWER TO PARAGRAPH 822: The allegations in Paragraph 822 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 822 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 822 and denies them on that basis.

ANSWER TO PARAGRAPH 823: The allegations in Paragraph 823 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 823 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 823 and denies them on that basis.

ANSWER TO PARAGRAPH 824: The allegations in Paragraph 824 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 824 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 824 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 825: The allegations in Paragraph 825 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Paragraph 825 purports to characterize a regulation which speaks for itself, and Endo denies Plaintiff's characterization of it. Endo denies the remaining allegations of Paragraph 825 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 825 and denies them on that basis.

ANSWER TO PARAGRAPH 826: The allegations in Paragraph 826 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 826 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 826 and denies them on that basis.

ANSWER TO PARAGRAPH 827: The allegations in Paragraph 827 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations of Paragraph 827 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 827 to the extent they refer to other defendants and denies them on that basis.

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

**Violation of RICO, 18 U.S.C. § 1961 et seq. – Opioid Marketing Enterprise
(Against Defendants Purdue, Cephalon, Janssen, Endo, and Mallinckrodt
(the “RICO Marketing Defendants”))**

ANSWER TO PARAGRAPH 828: Endo restates its answer to every allegation set forth above as though fully set forth herein.

ANSWER TO PARAGRAPH 829: The allegations in Paragraph 829 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 829 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 829 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 830: The allegations in Paragraph 830 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 830.

ANSWER TO PARAGRAPH 831: The allegations in Paragraph 831 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 831 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 831 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 832: The allegations in Paragraph 832 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 832 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 832 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 833: The allegations in Paragraph 833 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 833 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 833 and denies them on that basis.

ANSWER TO PARAGRAPH 834: The allegations in Paragraph 834 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 834 to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 834 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 835: The allegations in Paragraph 835 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 835 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 835 and denies them on that basis.

ANSWER TO PARAGRAPH 836: The allegations in Paragraph 836 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 836 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 836 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 837: The allegations in Paragraph 837 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 837 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 837 and denies them on that basis.

ANSWER TO PARAGRAPH 838: The allegations in Paragraph 838 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 838 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 838 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 839: The allegations in Paragraph 839 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 839 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 839 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 840: The allegations in Paragraph 840 of the Complaint and all subparts thereto contain legal conclusions or arguments that require no answer. To the extent an answer is required, Paragraph 840 purports to characterize statutes which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 840 and all subparts thereto to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 840 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 841: The allegations in Paragraph 841 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 841 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 841 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 842: The allegations in Paragraph 842 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Endo denies the allegations in Paragraph 842 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 842 and denies them on that basis.

ANSWER TO PARAGRAPH 843: The allegations in Paragraph 843 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 843 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 843 and denies them on that basis.

ANSWER TO PARAGRAPH 844: The allegations in Paragraph 844 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 844 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in remaining Paragraph 844 and denies them on that basis.

ANSWER TO PARAGRAPH 845: The allegations in Paragraph 845 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 845 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 845 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 846: The allegations in Paragraph 846 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 846 to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 846 and denies them on that basis.

ANSWER TO PARAGRAPH 847: The allegations in Paragraph 847 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 847 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 847 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 848: The allegations in Paragraph 848 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 848 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 848 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 849: The allegations in Paragraph 849 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 849 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 849 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 850: The allegations in Paragraph 850 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 850 to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 850 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 851: The allegations in Paragraph 851 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 851 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 851 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 852: The allegations in Paragraph 852 of the Complaint and all subparts thereto contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 852 and all subparts thereto to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 852 and the subparts thereto to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 853: The allegations in Paragraph 853 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 853 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 853 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 854: The allegations in Paragraph 854 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Endo denies that Plaintiff is entitled to any relief from Endo. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 854 and denies them on that basis.

ANSWER TO PARAGRAPH 855: The allegations in Paragraph 855 of the Complaint and all subparts thereto contain legal conclusions or arguments to which no answer is required. To the extent an answer is required, Endo denies that Plaintiff is entitled to any damages or other relief, including the relief requested in Paragraph 855 and all subparts thereto, from Endo.

SECOND CLAIM FOR RELIEF

Violation of RICO, 18 U.S.C. § 1961 et seq. – Opioid Supply Chain Enterprise (Against Defendants Purdue, Cephalon, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen (the “RICO Supply Chain Defendants”))

ANSWER TO PARAGRAPH 856: Endo restates its answer to every allegation set forth above as though fully set forth herein.

ANSWER TO PARAGRAPH 857: The allegations in Paragraph 857 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Paragraph 857 purports to characterize a statute which speaks for itself, and Endo denies Plaintiff’s characterization of it.

ANSWER TO PARAGRAPH 858: The allegations in Paragraph 858 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 858 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 858 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 859: The allegations in Paragraph 859 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Endo admits that it has at times been a member of the HDA. Except as expressly admitted, Endo denies the allegations in Paragraph 859 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 859 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 860: The allegations in Paragraph 860 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 860 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 860 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 861: The allegations in Paragraph 861 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 861 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 861 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 862: The allegations in Paragraph 862 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 862 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 862 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 863: The allegations in Paragraph 863 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 863 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 863 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 864: The allegations in Paragraph 864 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Paragraph 864 purports to characterize statutes which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the remaining allegations in Paragraph 864 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 864 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 865: The allegations in Paragraph 865 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that there are laws and regulations that govern the manufacture and distribution of controlled substances. Endo denies the allegations in Paragraph 865 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 865 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 866: The allegations in Paragraph 866 of the Complaint and all subparts thereto contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 866 and all subparts

thereto to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 866 and all subparts thereto to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 867: The allegations in Paragraph 867 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 867 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 867 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 868: The allegations in Paragraph 868 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 868 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 868 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 869: The allegations in Paragraph 869 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 869 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 869 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 870: The allegations in Paragraph 870 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Endo denies the allegations in Paragraph 870 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 870 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 871: The allegations in Paragraph 871 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 871 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 871 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 872: The allegations in Paragraph 872 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 872 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 872 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 873: The allegations in Paragraph 873 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 873 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 873 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 874: The allegations in Paragraph 874 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 874 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 874 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 875: The allegations in Paragraph 875 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 875 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 875 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 876: The allegations in Paragraph 876 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 876 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 876 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 877: The allegations in Paragraph 877 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 877 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 877 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 878: The allegations in Paragraph 878 of the Complaint contain legal conclusions or arguments that require no answer. Endo denies the allegations in Paragraph 878 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 878 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 879: The allegations in Paragraph 879 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 879 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 879 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 880: The allegations in Paragraph 880 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 880 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 880 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 881: The allegations in Paragraph 881 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that there are FDA-approved uses for opioid medications and that opioids expose users to the risks of addiction and abuse. Except as expressly admitted, Endo denies the

allegations in Paragraph 881 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 881 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 882: The allegations in Paragraph 882 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 882 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 882 and denies them on that basis.

ANSWER TO PARAGRAPH 883: The allegations in Paragraph 883 of the Complaint and all subparts thereto contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 883 and all subparts thereto to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 883 and denies them on that basis.

ANSWER TO PARAGRAPH 884: The allegations in Paragraph 884 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 884 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 884 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 885: The allegations in Paragraph 885 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 885 to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 885 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 886: The allegations in Paragraph 886 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that Plaintiff is entitled to any relief from Endo. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 886 and denies them on that basis.

ANSWER TO PARAGRAPH 887: The allegations in Paragraph 887 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent an answer is required, Endo denies that Plaintiff is entitled to any damages or other relief, including the relief requested in Paragraph 887, from Endo.

THIRD CLAIM FOR RELIEF
Public Nuisance Federal Common Law (Against All Defendants)²

ANSWER TO PARAGRAPH 888: Endo restates its answer to every allegation set forth above as though fully set forth herein.

ANSWER TO PARAGRAPH 889: The Court dismissed the Third Claim for Relief (“Third Claim”) of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 890: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

² In its June 13, 2019 Order, this Court dismissed the Public Nuisance Federal Common Law claim (Third Claim for Relief) against all Defendants. Order at 2, *In re: National Prescription Opiate Litigation, Blackfeet Tribe of the Blackfeet Indian Reservation v. Amerisource Bergen Drug Corp.*, No. 1:18-op-45749 (N.D. Ohio June 13, 2019) (adopting in relevant part the Report and Recommendation of the Magistrate Judge of April 1, 2019).

ANSWER TO PARAGRAPH 891: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 892: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 893: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 894: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 895: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 896: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 897: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 898: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 899: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 900: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 901: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 902: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 903: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 904: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 905: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 906: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 907: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 908: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 909: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 910: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 911: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 912: The Court dismissed the Third Claim of the Complaint and therefore no response is required.

FOURTH CLAIM FOR RELIEF

State Common Law Public Nuisance (Against All Defendants)

ANSWER TO PARAGRAPH 913: The allegations in Paragraph 913 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 913.

ANSWER TO PARAGRAPH 914: Endo restates its answer to every allegation set forth above as though fully set forth herein.

ANSWER TO PARAGRAPH 915: The allegations in Paragraph 915 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 915 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 915 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 916: The allegations in Paragraph 916 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Paragraph 916 purports to characterize the law which speaks for itself. Endo denies the allegations in Paragraph 916 to the extent they refer to Endo and its purported conduct.

ANSWER TO PARAGRAPH 917: The allegations in Paragraph 917 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 917 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 917 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 918: The allegations in Paragraph 918 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 918 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 918 and denies them on that basis.

ANSWER TO PARAGRAPH 919: The allegations in Paragraph 919 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies Plaintiff's characterization of the law.

ANSWER TO PARAGRAPH 920: Paragraph 920 of the Complaint purports to characterize case law which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 921: Paragraph 921 of the Complaint purports to characterize case law which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 922: The allegations in Paragraph 922 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 922 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 922 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 923: The allegations in Paragraph 923 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 923 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 923 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 924: The allegations in Paragraph 924 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 924 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 924 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 925: The allegations in Paragraph 925 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 925 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 925 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 926: The allegations in Paragraph 926 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 926 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 926 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 927: The allegations in Paragraph 927 of the Complaint and the subparts thereto contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 927 and its subparts to the

extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 927 and its subparts to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 928: The allegations in Paragraph 928 of the Complaint and the subparts thereto contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 928 and its subparts to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 928 and its subparts to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 929: The allegations in Paragraph 929 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 929 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 929 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 930: The allegations in Paragraph 930 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 930 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 930 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 931: The allegations in Paragraph 931 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Paragraph 931 purports to characterize statutes and regulations which speak for themselves, and Endo denies Plaintiff's characterization of them. Endo denies the allegations in Paragraph 926 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 926 and denies them on that basis.

ANSWER TO PARAGRAPH 932: The allegations in Paragraph 932 of the Complaint and the subparts thereto contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 932 and its subparts to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 932 and its subparts to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 933: The allegations in Paragraph 933 of the Complaint and the subparts thereto contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 933 and its subparts to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 933 and its subparts to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 934: The allegations in Paragraph 934 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 934 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 934 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 935: The allegations in Paragraph 935 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 935 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 935 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 936: The allegations in Paragraph 936 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 936 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 936 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 937: The allegations in Paragraph 937 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 937 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 937 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 938: The allegations in Paragraph 938 of the Complaint contain legal conclusions or arguments that require no answer. Endo admits that Endo Pharmaceuticals Inc. has marketed and sold certain prescription opioid medications, which have been regulated as controlled substances. Endo further admits that opioids expose users to the risks of addiction and abuse. Except as expressly admitted, Endo denies the allegations in

Paragraph 938 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 937 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 939: The allegations in Paragraph 939 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 939 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 939 and denies them on that basis.

ANSWER TO PARAGRAPH 940: The allegations in Paragraph 940 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 940 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 940 and denies them on that basis.

ANSWER TO PARAGRAPH 941: The allegations in Paragraph 941 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 941.

ANSWER TO PARAGRAPH 942: The allegations in Paragraph 942 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 942 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 942 and denies them on that basis.

ANSWER TO PARAGRAPH 943: The allegations in Paragraph 943 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Endo denies the allegations in Paragraph 943 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 943 and denies them on that basis.

ANSWER TO PARAGRAPH 944: The allegations in Paragraph 944 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 944.

ANSWER TO PARAGRAPH 945: The allegations in Paragraph 945 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 945 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 945 and denies them on that basis.

ANSWER TO PARAGRAPH 946: The allegations in Paragraph 946 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 946 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 946 and denies them on that basis.

ANSWER TO PARAGRAPH 947: The allegations in Paragraph 947 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that its conduct has created a public nuisance and denies the remaining allegations in Paragraph 947 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 947 and denies them on that basis.

ANSWER TO PARAGRAPH 948: The allegations in Paragraph 948 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that its conduct has created a public nuisance and denies the remaining allegations in Paragraph 948 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 948 and denies them on that basis.

ANSWER TO PARAGRAPH 949: The allegations in Paragraph 949 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 949 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 949 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 950: The allegations in Paragraph 950 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 950 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 950 and denies them on that basis.

ANSWER TO PARAGRAPH 951: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 951 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 952: The allegations in Paragraph 952 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 952 to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 952 and denies them on that basis.

ANSWER TO PARAGRAPH 953: The allegations in Paragraph 953 of the Complaint contain legal conclusions or arguments that require no answer. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 953 and denies them on that basis.

ANSWER TO PARAGRAPH 954: The allegations in Paragraph 954 of the Complaint contain legal conclusions or arguments that require no answer. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 954 and denies them on that basis.

ANSWER TO PARAGRAPH 955: The allegations in Paragraph 955 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 955 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 955 and denies them on that basis.

ANSWER TO PARAGRAPH 956: The allegations in Paragraph 956 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 956 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 956 and denies them on that basis.

ANSWER TO PARAGRAPH 957: The allegations in Paragraph 957 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 957.

ANSWER TO PARAGRAPH 958: The allegations in Paragraph 958 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 958 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 958 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 959: The allegations in Paragraph 959 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 959 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 959 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 960: The allegations in Paragraph 960 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent an answer is required, Endo denies that Plaintiff is entitled to any damages or other relief, including the relief requested in Paragraph 960, from Endo.

FIFTH CLAIM FOR RELIEF
Statutory Public Nuisance (Against All Defendants)

ANSWER TO PARAGRAPH 961: The allegations in Paragraph 961 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 961.

ANSWER TO PARAGRAPH 962: Endo restates its answer to every allegation set forth above as though fully set forth herein.

ANSWER TO PARAGRAPH 963: Paragraph 963 of the Complaint purports to characterize a statute which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 964: Paragraph 964 of the Complaint purports to characterize a statute which speaks for itself and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 965: Paragraph 965 of the Complaint purports to characterize a statute which speaks for itself and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 966: The allegations in Paragraph 966 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 966 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 966 and denies them on that basis.

ANSWER TO PARAGRAPH 967: The allegations in Paragraph 967 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 967 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 967 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 968: The allegations in Paragraph 968 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies that its conduct has created a public nuisance and denies the remaining allegations in Paragraph 968 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 968 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 969: The allegations in Paragraph 969 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 969 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 969 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 970: The allegations in Paragraph 970 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 970 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 970 and denies them on that basis.

ANSWER TO PARAGRAPH 971: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 971 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 972: The allegations in Paragraph 972 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 972 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 972 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 973: The allegations in Paragraph 973 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent an answer is required, Endo denies that Plaintiff is entitled to any relief from Endo.

ANSWER TO PARAGRAPH 974: Endo denies that Plaintiff is entitled to any relief from Endo.

SIXTH CLAIM FOR RELIEF
Negligence and Negligent Misrepresentation (Against All Defendants)³

ANSWER TO PARAGRAPH 975: Endo restates its answer to every allegation set forth above as though fully set forth herein.

ANSWER TO PARAGRAPH 976: The allegations in Paragraph 976 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 976 to the extent they relate to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 970 and denies them on that basis.

ANSWER TO PARAGRAPH 977: The allegations in Paragraph 977 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 977.

ANSWER TO PARAGRAPH 978: The allegations in Paragraph 978 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies Plaintiff's characterization of what the law requires.

ANSWER TO PARAGRAPH 979: The allegations in Paragraph 979 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo admits that there are laws and regulations that govern the manufacture, marketing

³ In its June 13, 2019 Order, this Court dismissed Plaintiff's claims for negligence per se. Order at 25, *In re: National Prescription Opiate Litigation, Blackfeet Tribe of the Blackfeet Indian Reservation v. Amerisource Bergen Drug Corp.*, No. 1:18-op-45749 (N.D. Ohio June 13, 2019). Therefore, Plaintiff's claims in the Sixth Claim for Relief that are based on negligence per se require no response.

and distribution of controlled substances but denies Plaintiff's characterization of what the law requires.

ANSWER TO PARAGRAPH 980: The allegations in Paragraph 980 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies Plaintiff's characterization of what the law requires.

ANSWER TO PARAGRAPH 981: The allegations in Paragraph 981 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 981.

ANSWER TO PARAGRAPH 982: The allegations in Paragraph 982 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies Plaintiff's characterization of what the law requires.

ANSWER TO PARAGRAPH 983: The allegations in Paragraph 983 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies Plaintiff's characterization of what the law requires, denies any insinuation that Endo did not act in accordance with the law, and denies the remaining allegations in Paragraph 983.

ANSWER TO PARAGRAPH 984: The allegations in Paragraph 984 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies any insinuation that it did not act in accordance with the law and denies the remaining allegations in Paragraph 984.

ANSWER TO PARAGRAPH 985: Endo denies the allegations in Paragraph 985 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 985 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 986: The allegations in Paragraph 986 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 986 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 986 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 987: The allegations in Paragraph 987 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 987 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 987 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 988: The allegations in Paragraph 988 of the Complaint and the subparts thereto contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 988 and its subparts to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 988 and its subparts to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 989: The allegations in Paragraph 989 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 989 to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 989 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 990: The allegations in Paragraph 990 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 990 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 990 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 991: The allegations in Paragraph 991 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 991 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 991 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 992: The allegations in Paragraph 992 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 992 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 992 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 993: The allegations in Paragraph 993 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is

required, Endo denies the allegations in Paragraph 993 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 993 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 994: The allegations in Paragraph 994 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 994.

ANSWER TO PARAGRAPH 995: The allegations in Paragraph 995 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 995 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 995 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 996: The allegations in Paragraph 996 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 996.

ANSWER TO PARAGRAPH 997: The allegations in Paragraph 997 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 997.

ANSWER TO PARAGRAPH 998: The allegations in Paragraph 998 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 998 to the extent they refer to Endo and its

purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 998 and denies them on that basis.

ANSWER TO PARAGRAPH 999: The allegations in Paragraph 999 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 999.

ANSWER TO PARAGRAPH 1000: The allegations in Paragraph 1000 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1000 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1000 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1001: The allegations in Paragraph 1001 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1001.

ANSWER TO PARAGRAPH 1002: The allegations in Paragraph 1002 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies Plaintiff's characterization of its legal duties and denies the remaining allegations in Paragraph 1002 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1000 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1003: The allegations in Paragraph 1003 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an

answer is required, Endo admits that Endo Pharmaceuticals Inc. has marketed and sold certain prescription opioids, which have been regulated as controlled substances. Endo further admits that opioids expose users to the risks of addiction and abuse. Except as expressly admitted, Endo denies the allegations in Paragraph 1003 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1003 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1004: The allegations in Paragraph 1004 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1004 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1004 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1005: The allegations in Paragraph 1005 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1005 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1005 and denies them on that basis.

ANSWER TO PARAGRAPH 1006: The allegations in Paragraph 1006 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1006 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief

as to the truth of the allegations in Paragraph 1006 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1007: The allegations in Paragraph 1007 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1007 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1007 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1008: The allegations in Paragraph 1008 of the Complaint contain legal conclusions or arguments that require no answer. Moreover, Paragraph 1008 purports to characterize laws which speak for themselves, and Endo denies Plaintiff's characterization of what the law requires.

ANSWER TO PARAGRAPH 1009: The allegations in Paragraph 1009 of the Complaint contain legal conclusions or arguments that require no answer. Moreover, Paragraph 1009 purports to characterize statutes and regulations which speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 1010: The allegations in Paragraph 1010 of the Complaint contain legal conclusions or arguments that require no answer. Moreover, Paragraph 1010 purports to characterize statutes and regulations which speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 1011: The allegations in Paragraph 1011 of the Complaint contain legal conclusions or arguments that require no answer. Moreover, Paragraph

1011 purports to characterize case law which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 1012: The allegations in Paragraph 1012 of the Complaint contain legal conclusions or arguments that require no answer. Moreover, Paragraph 1012 purports to characterize statutes and regulations which speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 1013: The allegations in Paragraph 1013 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1013 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1013 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1014: The allegations in Paragraph 1014 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1014 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1014 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1015: The allegations in Paragraph 1015 of the Complaint contain legal conclusions or arguments that require no answer. Moreover, Paragraph 1015 purports to characterize statutes and regulations which speak for themselves, and Endo denies Plaintiff's characterization of them.

ANSWER TO PARAGRAPH 1016: The Court dismissed Plaintiff's negligence per se claims and therefore no response is required.

ANSWER TO PARAGRAPH 1017: The allegations in Paragraph 1017 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1017 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1017 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1018: The allegations in Paragraph 1018 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1018 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1018 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1019: The Court dismissed Plaintiff's negligence per se claims and therefore no response is required.

ANSWER TO PARAGRAPH 1020: The allegations in Paragraph 1020 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1020 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1020 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1021: The Court dismissed Plaintiff's negligence per se claims and therefore no response is required.

ANSWER TO PARAGRAPH 1022: The allegations in Paragraph 1022 of the Complaint and the subparts thereto contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1022 and its subparts to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1022 and its subparts to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1023: The allegations in Paragraph 1023 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1023 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1023 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1024: The allegations in Paragraph 1024 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1024 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1024 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1025: The allegations in Paragraph 1025 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1025 to the extent they refer to

Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1025 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1026: The allegations in Paragraph 1026 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1026 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1026 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1027: The allegations in Paragraph 1027 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1027 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1027 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1028: The allegations in Paragraph 1028 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1028 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1028 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1029: The allegations in Paragraph 1029 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an

answer is required, Endo denies the allegations in Paragraph 1029 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1029 and denies them on that basis.

ANSWER TO PARAGRAPH 1030: The allegations in Paragraph 1030 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1030.

ANSWER TO PARAGRAPH 1031: The allegations in Paragraph 1031 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1031 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1031 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1032: The allegations in Paragraph 1032 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1032 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1032 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1033: The allegations in Paragraph 1033 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1033 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1033 and denies them on that basis.

ANSWER TO PARAGRAPH 1034: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1034 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 1035: The allegations in Paragraph 1035 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1035.

ANSWER TO PARAGRAPH 1036: The allegations in Paragraph 1036 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1036 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1036 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1037: The allegations in Paragraph 1037 of the Complaint contain legal conclusions or arguments that require no answer. Moreover, Paragraph 1037 purports to characterize case law which speaks for itself, and Endo denies Plaintiff's characterization of it.

ANSWER TO PARAGRAPH 1038: The allegations in Paragraph 1038 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1038 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1038 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1039: The allegations in Paragraph 1039 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1039 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1039 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1040: The allegations in Paragraph 1040 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1040 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1040 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1041: The allegations in Paragraph 1041 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1041 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1041 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1042: The allegations in Paragraph 1042 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1042 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief

as to the truth of the allegations in Paragraph 1042 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1043: The allegations in Paragraph 1043 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1043 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1043 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1044: The allegations in Paragraph 1044 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1044 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1044 and denies them on that basis.

ANSWER TO PARAGRAPH 1045: The allegations in Paragraph 1045 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1045 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1045 and denies them on that basis.

ANSWER TO PARAGRAPH 1046: The allegations in Paragraph 1046 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1046 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1046 and denies them on that basis.

ANSWER TO PARAGRAPH 1047: The allegations in Paragraph 1047 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1047 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1047 and denies them on that basis.

ANSWER TO PARAGRAPH 1048: The allegations in Paragraph 1048 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1048 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1048 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1049: The allegations in Paragraph 1049 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent an answer is required, Endo denies that Plaintiff is entitled to any damages or other relief, including the relief requested in Paragraph 1049, from Endo.

ANSWER TO PARAGRAPH 1050: The allegations in Paragraph 1050 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent an answer is required, Endo denies that Plaintiff is entitled to any damages or other relief, including the relief requested in Paragraph 1050, from Endo.

SEVENTH CLAIM FOR RELIEF
Common Law Fraud (Against the Marketing Defendants)

ANSWER TO PARAGRAPH 1051: Endo restates its answer to every allegation set forth above as though fully set forth herein.

ANSWER TO PARAGRAPH 1052: The allegations in Paragraph 1052 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1052 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1052 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1053: The allegations in Paragraph 1053 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1053 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1053 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1054: The allegations in Paragraph 1054 of the Complaint and all subparts thereto contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1054 and all subparts thereto to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1054 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1055: The allegations in Paragraph 1055 of the Complaint and its subparts contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1055 and its subparts to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 1055 and its subparts to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1056: The allegations in Paragraph 1056 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1056 to the extent they refer to Endo and its purported conduct and denies Plaintiff's characterization of its duties. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1056 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1057: The allegations in Paragraph 1057 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1057 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1057 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1058: The allegations in Paragraph 1058 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1058 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1058 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1059: The allegations in Paragraph 1059 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1059 to the extent they refer to

Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1059 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1060: The allegations in Paragraph 1060 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1060 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1060 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1061: The allegations in Paragraph 1061 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1061 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1061 and denies them on that basis.

ANSWER TO PARAGRAPH 1062: The allegations in Paragraph 1062 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1062 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1062 and denies them on that basis.

ANSWER TO PARAGRAPH 1063: The allegations in Paragraph 1063 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1063 to the extent they refer to

Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1063 and denies them on that basis.

ANSWER TO PARAGRAPH 1064: The allegations in Paragraph 1064 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1064 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1064 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1065: The allegations in Paragraph 1065 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1065 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1065 and denies them on that basis.

ANSWER TO PARAGRAPH 1066: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1066 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 1067: The allegations in Paragraph 1067 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1067 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1067 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1068: The allegations in Paragraph 1068 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1068 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1068 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1069: The allegations in Paragraph 1069 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent an answer is required, Endo denies that Plaintiff is entitled to any damages or other relief, including the relief requested in Paragraph 1069, from Endo.

EIGHTH CLAIM FOR RELIEF
Unjust Enrichment (Against All Defendants)

ANSWER TO PARAGRAPH 1070: Endo restates its answer to every allegation set forth above as though fully set forth herein.

ANSWER TO PARAGRAPH 1071: The allegations in Paragraph 1071 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1071 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1071 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1072: The allegations in Paragraph 1072 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1072 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief

as to the truth of the allegations in Paragraph 1072 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1073: The allegations in Paragraph 1073 of the Complaint contain legal conclusions or arguments that require no answer.

ANSWER TO PARAGRAPH 1074: The allegations in Paragraph 1074 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1074 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1074 and denies them on that basis.

ANSWER TO PARAGRAPH 1075: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1075 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 1076: Endo denies the allegations in Paragraph 1076 of the Complaint to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1076 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1077: The allegations in Paragraph 1077 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1077 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1077 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1078: The allegations in Paragraph 1078 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1078 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1078 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1079: The allegations in Paragraph 1079 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1079 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1079 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1080: The allegations in Paragraph 1080 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1080 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1080 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1081: The allegations in Paragraph 1081 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1081 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief

as to the truth of the allegations in Paragraph 1081 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1082: The allegations in Paragraph 1082 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1082 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1082 to the extent they refer to other defendants and denies them on that basis

ANSWER TO PARAGRAPH 1083: The allegations in Paragraph 1083 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1083 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1083 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1084: The allegations in Paragraph 1084 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1084 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1084 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1085: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1085 and denies them on that basis.

ANSWER TO PARAGRAPH 1086: The allegations in Paragraph 1086 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent an answer is required, Endo denies that Plaintiff is entitled to any damages or other relief, including the relief requested in Paragraph 1086, from Endo.

NINTH CLAIM FOR RELIEF
Civil Conspiracy (Against All Defendants)

ANSWER TO PARAGRAPH 1087: Endo restates its answer to every allegation set forth above as though fully set forth herein.

ANSWER TO PARAGRAPH 1088: The allegations in Paragraph 1088 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1088.

ANSWER TO PARAGRAPH 1089: The allegations in Paragraph 1089 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1089.

ANSWER TO PARAGRAPH 1090: The allegations in Paragraph 1090 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1090 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1090 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1091: The allegations in Paragraph 1091 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1091 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief

as to the truth of the allegations in Paragraph 1091 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1092: The allegations in Paragraph 1092 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1092.

ANSWER TO PARAGRAPH 1093: The allegations in Paragraph 1093 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1093 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1093 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1094: The allegations in Paragraph 1094 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1094 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1094 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1095: The allegations in Paragraph 1095 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1095 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1095 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1096: The allegations in Paragraph 1096 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1096 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1096 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1097: The allegations in Paragraph 1097 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1097 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1097 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1098: The allegations in Paragraph 1098 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1098 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1098 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1099: The allegations in Paragraph 1099 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1099 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief

as to the truth of the allegations in Paragraph 1099 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1100: The allegations in Paragraph 1100 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1100 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1100 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1101: The allegations in Paragraph 1101 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1101 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1101 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1102: The allegations in Paragraph 1102 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1102 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1102 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1103: The allegations in Paragraph 1103 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1103 to the extent they refer to

Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1103 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1104: Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1104 of the Complaint and denies them on that basis.

ANSWER TO PARAGRAPH 1105: The allegations in Paragraph 1105 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent an answer is required, Endo denies that Plaintiff is entitled to any damages or other relief, including the relief requested in Paragraph 1105, from Endo.

ANSWER TO PARAGRAPH 1106: The allegations in Paragraph 1106 of the Complaint contain legal conclusions or arguments to which no answer is required. To the extent an answer is required, Endo denies that Plaintiff is entitled to any damages or other relief, including the relief requested in Paragraph 1106, from Endo.

TENTH CLAIM FOR RELIEF
Violations Of Montana Unfair Trade Practices and Consumer Protection Act, MCA § 30-14-101, et seq. (Against All Defendants)⁴

ANSWER TO PARAGRAPH 1107: Endo restates its answer to every allegation set forth above as though fully set forth herein.

ANSWER TO PARAGRAPH 1108: The Court dismissed the Tenth Claim for Relief (“Tenth Claim”) of the Complaint and therefore no response is required.

⁴ In its June 13, 2019 Order, this Court dismissed the Montana Unfair Trade Practices and Consumer Protection Act claim (Tenth Claim) against all Defendants. Order at 2, *In re: National Prescription Opiate Litigation, Blackfeet Tribe of the Blackfeet Indian Reservation v. Amerisource Bergen Drug Corp.*, No. 1:18-op-45749 (N.D. Ohio June 13, 2019) (adopting in relevant part the Report and Recommendation of the Magistrate Judge of April 1, 2019).

ANSWER TO PARAGRAPH 1109: The Court dismissed the Tenth Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 1110: The Court dismissed the Tenth Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 1111: The Court dismissed the Tenth Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 1112: The Court dismissed the Tenth Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 1113: The Court dismissed the Tenth Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 1114: The Court dismissed the Tenth Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 1115: The Court dismissed the Tenth Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 1116: The Court dismissed the Tenth Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 1117: The Court dismissed the Tenth Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 1118: The Court dismissed the Tenth Claim of the Complaint and therefore no response is required.

ANSWER TO PARAGRAPH 1119: The Court dismissed the Tenth Claim of the Complaint and therefore no response is required.

PUNITIVE DAMAGES

ANSWER TO PARAGRAPH 1120: Endo restates its answer to every allegation set forth above as though fully set forth herein.

ANSWER TO PARAGRAPH 1121: The allegations in Paragraph 1121 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegation in Paragraph 1121 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1121 to the extent they refer to other defendants and denies them on that basis.

ANSWER TO PARAGRAPH 1122: The allegations in Paragraph 1122 of the Complaint contain legal conclusions or arguments that require no answer. To the extent that an answer is required, Endo admits that certain opioid medications have been regulated as controlled substances. Except as expressly admitted, Endo denies the allegations in Paragraph 1122 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1122 and denies them on that basis.

ANSWER TO PARAGRAPH 1123: The allegations in Paragraph 1123 of the Complaint contain legal conclusions or arguments that require no answer. To the extent an answer is required, Endo denies the allegations in Paragraph 1123 to the extent they refer to Endo and its purported conduct. Endo lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1123 to the extent they refer to other defendants and denies them on that basis.

PRAYER FOR RELIEF

ANSWER TO PARAGRAPH 1124: Endo denies that Plaintiff is entitled to any damages or other relief, including the relief requested in subparts (a) through (q) of Paragraph 1124, from Endo.

AFFIRMATIVE DEFENSES

Without assuming any burden of proof that it would not otherwise bear, Endo hereby asserts the following separate and additional affirmative defenses to the allegations and claims in the Complaint. All of the following defenses are pleaded in the alternative and none constitute an admission that Endo is in any way liable to Plaintiff, that Plaintiff have been or will be injured or damaged in any way, or that Plaintiff is entitled to any relief whatsoever.

Endo further incorporates by reference any defenses applicable to it that are asserted by any other Defendant as if fully set forth herein. Endo reserves the right to assert other defenses as this action proceeds or amend its Answer and hereby gives notice that it may further supplement the facts regarding its currently pleaded defenses, based on information that may become available or apparent during the discovery proceedings in this matter.

As a defense to the Complaint and each and every allegation contained therein, Endo asserts:

**FIRST AFFIRMATIVE DEFENSE
(Failure To State A Claim)**

The Complaint fails to allege sufficient facts to state a claim upon which relief can be granted, and fails to plead a legally cognizable injury.

SECOND AFFIRMATIVE DEFENSE
(Failure To Plead With Requisite Particularity)

Plaintiff has not pled fraud with the required particularity, including under Federal Rule of Civil Procedure 9(b).

THIRD AFFIRMATIVE DEFENSE
(Statute of Limitations and Laches)

The claims are barred in whole or part by the applicable statute of limitations and/or the equitable doctrine of laches. Plaintiff's claims are based largely on alleged acts or omissions that occurred long before any applicable limitations period and thus are time-barred.

FOURTH AFFIRMATIVE DEFENSE
(Abrogation)

Plaintiff's common law and public nuisance claims have been abrogated by the Montana products liability and public nuisance statutes.

FIFTH AFFIRMATIVE DEFENSE
(Lack of Privity)

Endo did not sell or distribute products directly to Plaintiff. Plaintiff's claims are, therefore, barred by lack of privity between Plaintiff and Endo.

SIXTH AFFIRMATIVE DEFENSE
(Equitable Estoppel and/or Waiver)

The doctrines of estoppel and/or waiver bar Plaintiff's claims. The imposition of injunctive relief and/or civil penalties would be inequitable, particularly in light of Endo's lawful and proper sale of opioid medications that are heavily regulated and include FDA-approved labeling.

SEVENTH AFFIRMATIVE DEFENSE
(Failure to Join Necessary or Indispensable Parties)

Plaintiff has failed to join one or more necessary and indispensable parties, including without limitation healthcare providers, prescribers, patients, government agencies, and other

third parties who have engaged in, or failed to reasonably prevent, unauthorized or illicit prescribing, dispensing, diversion, or use of prescription opioid medications or illicit drugs.

**EIGHTH AFFIRMATIVE DEFENSE
(Preemption)**

Plaintiff's claims are barred because they are preempted by federal law and regulation, including by the U.S. Food, Drug, and Cosmetic Act, the regulations promulgated pursuant thereto, and the Supremacy Clause of the United States Constitution. To the extent the Plaintiff's claims are based on alleged misrepresentations made to the U.S. Food and Drug Administration ("FDA"), such claims are barred pursuant to *Buckman Co. v. Plaintiff's Legal Committee*, 531 U.S. 341 (2001).

**NINTH AFFIRMATIVE DEFENSE
(Preemption (Generics))⁵**

Any claims pertaining to generic opioid medications are preempted. See *PLIVA, Inc. v. Mensing*, 564 U.S. 604 (2011); *Mutual Pharmaceuticals Co. v. Bartlett*, 570 U.S. 472 (2013).

**TENTH AFFIRMATIVE DEFENSE
(Lawful Activity)**

The opioid medications at issue were manufactured, distributed, and labeled in accordance with the provisions of federal law including the U.S. Food, Drug, and Cosmetic Act and the regulations promulgated pursuant thereto. Endo's conduct conformed with the U.S. Food, Drug, and Cosmetic Act, the requirements of the FDA, the Controlled Substances Act, and the requirements of the Drug Enforcement Agency. Moreover, the activities alleged

⁵ In its June 13, 2019 Order, this Court held that Plaintiff's claims concerning generic manufacturers' alleged failure to provide additional warnings or clarify representations by brand-name manufacturers were preempted. Order at 2, *In re: National Prescription Opiate Litigation, The Blackfeet Tribe of the Blackfeet Indian Reservation v. Amerisource Bergen Drug Corp.*, No. 1:18-op-45749 (N.D. Ohio June 13, 2019) (adopting in relevant part Magistrate Report and Recommendation of April 1, 2019).

conformed with all state and federal statutes, regulations, and industry standards based upon the state of knowledge existing at the relevant time(s) alleged.

**ELEVENTH AFFIRMATIVE DEFENSE
(Proper Labeling Subject to FDA Review and Approval)**

Statements in branded or unbranded materials comporting with FDA-approved uses are not misleading as a matter of law or otherwise actionable.

**TWELFTH AFFIRMATIVE DEFENSE
(Primary Jurisdiction)**

Plaintiff's claims are barred and/or this Court should defer this matter to the FDA, in whole or in part, pursuant to the doctrine of primary jurisdiction.

**THIRTEENTH AFFIRMATIVE DEFENSE
(Agency Deference)**

Plaintiff's claims are barred, in whole or in part, by the deference that common law gives to discretionary actions by the FDA under the FDCA.

**FOURTEENTH AFFIRMATIVE DEFENSE
(Separation of Powers)**

Plaintiff's claims are barred or limited by the separation of powers doctrine.

**FIFTEENTH AFFIRMATIVE DEFENSE
(Lack of Criminal Conviction)**

Plaintiff's alleged injury through criminal acts claims fails because there has been no relevant criminal conviction.

**SIXTEENTH AFFIRMATIVE DEFENSE
(Truthful and Non-Misleading Statements)**

The representations or statements alleged to have been made were true and accurate at the time made and/or otherwise were made in good faith, with a reasonable belief as to their validity and accuracy and with a reasonable belief that all conduct was lawful.

SEVENTEENTH AFFIRMATIVE DEFENSE
(First Amendment and Related Doctrines)

Plaintiff's claims are barred, in whole or in part, by applicable provisions of the United States Constitution and the Montana Constitution, including but not limited to the First Amendment to the United States Constitution and Article II, Part II, § 7 of the Montana Constitution, and applicable provisions of any other state whose laws may apply.

EIGHTEENTH AFFIRMATIVE DEFENSE
(Learned Intermediary Doctrine)

Plaintiff's claims are barred by the learned intermediary doctrine. The products at issue are prescribed and dispensed by physicians and other healthcare providers and their agents who used their informed, independent medical judgment in making prescribing decisions for a given patient.

NINETEENTH AFFIRMATIVE DEFENSE
(Sophisticated User Doctrine)

Plaintiff's claims are barred by the sophisticated user doctrine. Because of their training and experience, health care providers who prescribe opioid medications know or reasonably should know of the potential risks, and Endo had no duty to warn and cannot be held liable for failing to warn of risks and complications of which members of the relevant medical community knew or should have known.

TWENTIETH AFFIRMATIVE DEFENSE
(Informed Consent)

The healthcare providers who prescribe FDA-approved opioid medications have a duty to provide patients with material information so they can make informed decisions about a proposed treatment, and Endo is entitled to rely on this duty—as well as healthcare providers' professional education, training and experience with respect to potential risks and complications associated with opioid medications. Because healthcare providers were provided with adequate

warnings, Endo is entitled to rely on healthcare providers' provision of information to patients. Plaintiffs' claims thus are barred by patients' provision of informed consent.

**TWENTY-FIRST AFFIRMATIVE DEFENSE
(Ratification and Voluntary Payment)**

Plaintiff's alleged loss, damage, injury, harm, or expense, if any, was caused in whole or in part by Plaintiff's ratification of any alleged misconduct, including under the voluntary payment doctrine.

**TWENTY-SECOND AFFIRMATIVE DEFENSE
(Unclean Hands)**

Plaintiff is barred from recovering, in whole or in part, by the doctrine of unclean hands. Should discovery show that Plaintiff or its agents acted inequitably in responding to the alleged harms, such conduct should be taken into account in assessing Plaintiffs' claims and whether, and to what extent, they are entitled to relief in this action.

**TWENTY-THIRD AFFIRMATIVE DEFENSE
(Assumption of the Risk, Contributory Negligence, and Open and Obvious Danger Doctrines)**

The claims set forth in the Complaint are barred, in whole or in part, by the doctrines of assumption of risk, contributory negligence, and open and obvious danger. Prescription opioid products have associated known risks that can be unavoidable even within the scope of prescribed and intended use, but are reasonable in comparison to the benefits conferred. The risks of opioid medications, and the alleged incurred costs and/or injuries purportedly caused by opioid medications, were known and disclosed to Plaintiff, Plaintiff's contractors and agents, Oklahoma consumers, and prescribing healthcare providers for years.

TWENTY-FOURTH AFFIRMATIVE DEFENSE
(Failure to Monitor or Mitigate)

Plaintiff has failed to take appropriate and necessary steps to mitigate any alleged damages. Among other things, it continued to permit use of, approve, or pay for opioid medications, either directly or through authorized third parties, without further inquiry into the necessity of the medication and, while aware of the risks of opioid medications, it failed to take adequate steps to monitor or limit any alleged wrongful prescribing, distribution, or use.

TWENTY-FIFTH AFFIRMATIVE DEFENSE
(State of the Art)

Plaintiff may not recover because the methods, standards, or techniques of designing, manufacturing, labeling and distributing the prescription opioid medications at issue complied with and were in conformity with the generally recognized state of the art at the time the products were designed, manufactured, labeled, and distributed.

TWENTY-SIXTH AFFIRMATIVE DEFENSE
(Speculative and Remote Injuries)

The alleged injuries asserted by Plaintiff are too speculative, derivative, and/or remote from the alleged wrongful conduct to be a basis for liability as a matter of law and due process.

TWENTY-SEVENTH AFFIRMATIVE DEFENSE
(Intervening and Superseding Causes)

The alleged misconduct was not the but-for, proximate, or legal cause of purported injuries, harm, or damages and/or Plaintiff's injuries, if any, were the result of superseding and/or intervening causes, including but not limited to the criminal acts of third parties, over which Endo had no control. Moreover, the claims set forth in the Complaint are barred because the purported injuries, harm, or damages (if any) were caused, in whole or in part, by Plaintiff's own conduct, and/or that of its contractors or agents, which constitutes superseding and intervening cause(s).

TWENTY-EIGHTH AFFIRMATIVE DEFENSE
(No reliance)

Neither the patients prescribed opioid medications nor their prescribers relied to their detriment upon any lawful statement in determining to use the medications at issue.

TWENTY-NINTH AFFIRMATIVE DEFENSE
(Opinion)

To the extent Plaintiff seeks to impose liability for broad, general statements regarding the value or quality of products that were made to and reasonably understood by providers as opinion, such statements cannot constitute false representations as a matter of law.

THIRTIETH AFFIRMATIVE DEFENSE
(Medical Necessity)

Plaintiff fails to plead and cannot establish that they incurred any costs, or that any alleged injury was caused as a result of, any opioid prescription promoted or sold by Endo and that was medically inappropriate or should not have been written, or that any allegedly improper conduct caused any health care provider to write any unnecessary, ineffective or harmful opioid prescriptions.

THIRTY-FIRST AFFIRMATIVE DEFENSE
(Standing)

Plaintiff lacks standing to bring its claims and to obtain the relief it seeks, including its RICO claims.

THIRTY-SECOND AFFIRMATIVE DEFENSE
(Unique Reactions)

Plaintiff's purported injuries, harm, or damages (if any), were the result of pre-existing conditions or idiosyncratic reactions to medications and/or occurred by operation of nature or as result of circumstances over which Endo had and continues to have no control.

THIRTY-THIRD AFFIRMATIVE DEFENSE
(Misuse of Products)

Plaintiff's claims are barred, in whole or in part, by the alteration, modification, illicit and/or illegal use or misuse by third parties of the opioid medications at issue.

THIRTY-FOURTH AFFIRMATIVE DEFENSE
(Commerce and Dormant Commerce Clause)

Plaintiff's claims are barred, in whole or in part, by the Commerce Clause of the United States Constitution.

THIRTY-FIFTH AFFIRMATIVE DEFENSE
(Due Process and Ex Post Facto)

Plaintiff's claims are barred because they violate procedural and substantive due process rights under the Fourteenth Amendment to the U.S. Constitution and Article II, Part II, § 17 of the Montana Constitution, and the right to be free from retroactive or ex post facto laws as guaranteed by Article I, § 10 of the United States Constitution and Article II, Part II, §§ 17, 31 of the Montana Constitution.

THIRTY-SIXTH AFFIRMATIVE DEFENSE
(Improper Financial Arrangement)

Endo's rights to fair process (including under the Due Process Clause of the U.S. Constitution and Article II, Part II, § 17 of the Montana Constitution) are violated by any financial or other arrangement that might distort a government attorney's duty to pursue justice rather than his or her personal interests, financial or otherwise, in the context of a civil enforcement proceeding, including by any use by Plaintiff of a private contingency fee counsel in this action.

THIRTY-SEVENTH AFFIRMATIVE DEFENSE
(Municipal Services Doctrine)

Plaintiff's claims are barred, in whole or part, by the free public services doctrine and/or municipal cost recovery rule. Plaintiffs are not entitled to recover governmental expenditures as a matter of law.

THIRTY-EIGHTH AFFIRMATIVE DEFENSE
(Economic Loss Doctrine)

Plaintiff's claims are barred or limited by the economic loss rule.

THIRTY-NINTH AFFIRMATIVE DEFENSE
(No Benefit from Plaintiff)

Plaintiff's claim for unjust enrichment is barred or limited because Endo did not receive and retain any alleged benefit from Plaintiff.

FORTIETH AFFIRMATIVE DEFENSE
(Subrogation)

Plaintiff has failed to comply with the requirement that it identify each patient in whose claim(s) it has a subrogation interest.

FORTY-FIRST AFFIRMATIVE DEFENSE
(Double Recovery)

Plaintiff's claims are barred, in whole or in part, to the extent they seek to recover any damages, restitution, costs, or other payments that have been reimbursed, paid, or borne by other persons or entities. Any verdict of judgment that might be recovered must be reduced by those amounts that already have been or will in the future, with reasonable certainty, be paid to Plaintiff by others or indemnify Plaintiff.

FORTY-SECOND AFFIRMATIVE DEFENSE
(Set-off)

Endo is entitled to a credit, set-off, or offset for all sums of money received or available from or on behalf of any tortfeasor(s) for the same injuries alleged in Plaintiff's

Complaint, including but not limited to any and all settlements Plaintiff may reach with any tortfeasor(s).

**FORTY-THIRD AFFIRMATIVE DEFENSE
(Comparative Fault)**

To the extent that Plaintiff's alleged injuries, harm, and/or damages were proximately caused or contributed to by Plaintiff's own conduct or the conduct of others, Endo is entitled to an individual assessment of fault for each party alleged to have caused any injury, harm, or damage to Plaintiff. *See* Mont. Code § 27-1-702.

**FORTY-FOURTH AFFIRMATIVE DEFENSE
(Several Liability and Allocation)**

Endo's alleged liability, if any, must be limited in accordance with the percentage of fault allocated to it by the ultimate trier of fact and/or law. Each defendant may only be severally liable for any injuries or expenses. Plaintiff's alleged damages are not indivisible but comprise separate and discrete costs.

**FORTY-FIFTH AFFIRMATIVE DEFENSE
(Severance of Parties)**

The claims asserted against Endo and other Defendants do not arise out of the same transaction, occurrence, or series of transactions or occurrences as required by Fed. R. Civ. P. 20 for joinder of parties. Plaintiff fails to connect any of the alleged marketing activities of Endo to those of other Defendants. Accordingly, the Court should sever or dismiss Plaintiff's claims against Endo pursuant to Fed. R. Civ. P. 20 and 21.

**FORTY-SIXTH AFFIRMATIVE DEFENSE
(Failure of Exemplary Damages / Excessive Fines Violation)**

Plaintiff's claims for punitive damages, statutory damages, civil penalties, and other relief are prohibited under the Fifth, Eighth, and Fourteenth Amendments of the United States

Constitution, and Article II, Part II, §§ 17 and 22 of the Montana Constitution. Plaintiff's claims for punitive damages, statutory damages, civil penalties, and other relief:

- a. have no basis in law or fact;
- b. are not recoverable because the Complaint's allegations are legally insufficient to support or allow the imposition of punitive damages, statutory damages, civil penalties, or other relief against Endo consistent with the United States Constitution or the Montana Constitution or Montana Law;
- c. cannot be sustained because the laws setting forth the standard(s) for determining liability for, and the amount(s) of, punitive damages, statutory damages, civil penalties, or other relief fail to give Endo prior notice of the conduct for which punitive damages, civil penalties, or other relief may be imposed and the severity of the penalty that may be imposed, and are void for vagueness in violation of Endo's due process rights guaranteed by the Fifth and Fourteenth Amendments to the United States Constitution and by Article II, Part II, § 17 of the Montana Constitution;
- d. cannot be sustained because any award of punitive damages, statutory damages, civil penalties, or other relief exceeding the limits authorized by law would violate Endo's due process and equal protection rights guaranteed by the Fifth and Fourteenth Amendments to the United States Constitution and by Article II, Part II, § 17 of the Montana Constitution and would be improper under the laws or common law of Montana;
- e. cannot be sustained because an award of punitive damages, statutory damages, civil penalties, or other relief in this case, combined with any prior,

contemporaneous, or subsequent judgments against Endo for punitive damages, civil penalties, or other relief arising from the distribution, supply, marketing, sale, promotion, or use of Endo's products would constitute constitutionally impermissible multiple punishments for the same wrong and double jeopardy under the Fifth Amendment to the United States Constitution and by Article II, Part II, § 25 of the Montana Constitution;

- f. cannot be sustained because any award of punitive damages, statutory damages, civil penalties, or other relief without the apportionment of the award separately and severally between or among the alleged joint tortfeasors, as determined by the percentage of the wrong(s) allegedly committed by each tortfeasor, would violate Endo's due process and equal protection rights guaranteed by the Fifth and Fourteenth Amendments to the United States Constitution and by Article II, Part II, § 17 of the Montana Constitution; and
- g. cannot be sustained because subjecting Endo to punitive damages, statutory damages, civil penalties, or other relief that is penal in nature without the same protections accorded to criminal defendants would violate Endo's rights guaranteed by, *inter alia*, the Fourth, Fifth, Sixth, and Fourteenth Amendments to the United States Constitution and by Article II, Part II, §§ 17, 24, 25 and 28, among others, of the Montana Constitution.
- h. cannot be sustained because any punitive damages may only be awarded after consideration of any and all punitive damages awards in other cases involving the same acts or course of conduct. Mont. Code § 27-1-221.

FORTY-SEVENTH AFFIRMATIVE DEFENSE
(Failure of Restitution or Rescission)

Plaintiff is not entitled to any relief in the form of restitution or rescission because it cannot restore the *status quo ante*.

FORTY-EIGHTH AFFIRMATIVE DEFENSE
(Capped Damages)

The damages to which Plaintiff may be entitled to recover if liability is established (which liability is specifically denied) are capped.

FORTY-NINTH AFFIRMATIVE DEFENSE
(Adequate Remedy at Law)

To the extent Plaintiff attempts to seek equitable relief, Plaintiff is not entitled to such relief because it has an adequate remedy at law and cannot otherwise satisfy the elements for equitable relief.

FIFTIETH AFFIRMATIVE DEFENSE
(No Attorney's Fees)

Plaintiff is barred from recovery of attorney's fees under any applicable provisions of law, including but not limited to Section 25-10-301 of the Montana Rules of Civil Procedure.

FIFTY-FIRST AFFIRMATIVE DEFENSE
(No Public Right)

Plaintiff's public nuisance claims are barred or limited because, among other reasons, (i) no action of Endo involved interference with real property; (ii) illegal conduct perpetrated by third-parties involving the use of a legal product does not involve a public right against a manufacturer sufficient to state a claim for public nuisance; (iii) the alleged public nuisance would have impermissible extraterritorial reach; and (iv) Endo's alleged wrongful conduct is too remote from the alleged "public" injury as a matter of law and due process.

FIFTY-SECOND AFFIRMATIVE DEFENSE
(Unconstitutionally Vague)

The Montana public nuisance statute is unconstitutionally vague.

FIFTY-THIRD AFFIRMATIVE DEFENSE
(Federally-Funded Healthcare Costs)

To the extent Plaintiff seeks to recover federally-funded healthcare costs provided either directly from the Indian Health Service (IHS), or under “self-determination” compacts or contracts under the Indian Self-Determination and Education Assistance Act (ISDEAA), 25 U.S.C. § 5301 et seq., such recovery is barred by the Indian Health Care Improvement Act (IHCIA), 25 U.S.C. § 1601 et seq., and Federal Medical Care Recovery Act (MCRA), 42 U.S.C. § 2641 et seq.

FIFTY-FOURTH AFFIRMATIVE DEFENSE
(Other Affirmative Defenses)

Endo incorporates by reference and adopts all the Affirmative Defenses that have been or are subsequently asserted by any other Defendant to the extent such defense would also be applicable to Plaintiff’s claims against Endo.

FIFTY-FIFTH AFFIRMATIVE DEFENSE
(Right to Supplement)

Endo reserves the right to supplement and/or modify its responses and defenses asserted herein.

ENDO’S PRAYER FOR RELIEF

WHEREFORE, Defendants Endo Health Solutions Inc. and Endo Pharmaceuticals Inc. respectfully request that:

- (a) The Complaint be dismissed with prejudice;

(b) Plaintiff's claims for injunctive and equitable relief, damages, and all other relief be denied;

(c) They be awarded their costs and expenses incurred herein, including reasonable attorneys' fees;

(d) A trial by jury on all issues so triable; and

(e) All other relief to which they may appear to be entitled.

Respectfully submitted,

Dated: July 26, 2019

/s/ Sean O. Morris

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*Attorneys for Endo Health Solutions Inc. and
Endo Pharmaceuticals Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of July, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. The foregoing will be served on counsel of record.

/s/ Sean O. Morris

Sean O. Morris

*Attorney for Endo Health Solutions Inc. and
Endo Pharmaceuticals Inc.*